PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

1330 SOUTH KILBOURN AVENUE FACILITY FORMERLY THE VALSPAR CORPORATION -PAINT CHICAGO, ILLINOIS

ILD 081 040 107

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region	:	5
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Prepared by	:	PRC Environmental Management, Inc. (Ken Valder)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the property located at 1330 South Kilbourn Avenue in Chicago, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility at 1330 South Kilbourn Avenue is a vacant paint plant consisting of 33 multi-story buildings on 18.1 acres of land. The former production buildings are as high as seven stories. Twelve additional buildings were burned during a fire in 1982. The remains of those buildings have been covered with fill from an unknown source. Of the existing buildings, several have been partially or completely burned during fires.

The most recent operator of the facility is The Valspar Corporation (Valspar), which used the facility between 1976 and 1984 to produce paint, latex, and varnishes. Valspar left the facility in 1984. Valspar and American National Bank and Trust Company of Chicago (American National) donated the property to Goodwill Industries of Chicago and Cook County, Inc. (Goodwill), a not-for-profit organization in the state of Illinois, on October 31, 1984. Valspar representatives claim that when Valspar vacated the facility, it closed its RCRA units and was no longer subject to RCRA regulation. However, inspections by the Illinois Environmental Protection Agency (IEPA) after Valspar left the facility revealed that over 300 tanks containing primarily commercial solvents and resins remained on site.

IEPA required Valspar to clean up the facility, and limited response actions have occurred to date. According to Valspar, all materials classified as flammable, ignitable, or characteristically toxic for heavy metals have been removed from the facility. However, sampling efforts undertaken by IEPA, Valspar's consultants, Goodwill's consultants, and an EPA Technical Assistance Team (TAT) at the facility have indicated that areas of contamination still exist. Additionally, tanks and containers observed during the VSI still contain various amounts of uncharacterized materials.

Goodwill claims that Valspar is liable for the environmental concerns present at the facility. Goodwill filed a lawsuit against Valspar in June 1989, and issues surrounding the facility are still in litigation. The Illinois Attorney General (IAG) is working with Valspar, Goodwill, and IEPA to come to an agreement about the facility.

According to Valspar, it closed its RCRA-regulated units when it left the facility in 1984. However, PRC's file search during the PA revealed that neither of the two hazardous waste storage units identified in Valspar's Part A permit application on file at EPA were properly closed. Two other units that Valspar has since identified as RCRA-regulated units were properly closed.

The RCRA-regulated units are SWMUs. However, because of the overall condition of the facility, PRC could not locate or identify these units. They are not addressed individually in this PA/VSI report. PRC recommends that Valspar identify the locations of these units and provide information necessary to characterize them.

PRC identified several discrete AOCs during the VSI. The AOCs listed below are presented as general categories of potential and observed contamination. Most of these AOCs are endemic throughout the facility; most AOCs are present in virtually every building on site.

Areas of Concern

1. Drums and small containers
2. Tanks
3. Piping raceways
4. Outside spill areas
5. Polychlorinated biphenyl (PCB) contamination
6. Asbestos piping insulation
7. Heavy metal dust and peeling paint
8. Alleged lead smelting operations
9. Unknown, potential hazards

Documented releases to the soil and to portions of building interiors have occurred. The potential for further release is high. PRC observed soil contamination in several areas. Pipes above the soil and in various buildings continue to release their contents. Additionally, the interior of several buildings contains PCBs and lead-containing paint. Although the facility is fenced, PRC found evidence that unauthorized persons have accessed it. PRC observed articles of clothing, magazines, beverage containers, mattresses, and graffiti in various buildings at the facility. If people come into contact with any of the released material, either indoors or outdoors, they may be at risk.

Soil contamination provides the potential for ground-water and surface water contamination. Shallow ground-water conditions in the area are little known. Deeper aquifers are used for industrial purposes within 3/4 mile of the facility. Drainage from the facility probably enters storm sewers in the neighborhood. These sewers discharge to the Chicago Sanitary and Ship Canal about 2-3/4 miles south of the facility.

The potential for release to air is moderate to high. Sampling at the facility has indicated that asbestos piping insulation is present. Additionally, paint containing lead and soils contaminated with lead and solvents have been identified. PRC identified uncovered drums containing volatile liquids during the VSI. Asbestos fibers, small paint chips, contaminated soils, and volatile vapors may be blowing off site during windy periods.

PRC recommends that the facility be secured immediately. Because the facility has been accessed by the general public, and because PRC observed unlabeled drums and entire building floors covered with unidentified liquids and sludges, PRC believes that the facility may be considered an illegal disposal site.

PRC recommends that a RCRA Facility Investigation (RFI) be planned and undertaken immediately. As part of the RFI, the owners should perform an inventory of the facility, including all tanks, containers, and piping. Materials found in tanks, containers, and piping should be sampled to fully characterize materials remaining on site. PRC recommends soil and soil gas sampling for volatile organic compounds, metals, and PCBs to determine the nature and extent of any unidentified releases of hazardous constituents to the environment. PRC also recommends that interior peeling paint and floor dust be sampled for metals to determine the nature and extent of any metals contamination. PRC recommends PCB wipe sampling throughout the facility to determine the nature and extent of PCB contamination.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes a review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the facility at 1330 South Kilbourn Avenue in Chicago, Illinois. The PA was completed on July 12, 1991. PRC gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. After the VSI, PRC also reviewed information provided by Goodwill Industries of Chicago and Cook County, Inc. (Goodwill), The Valspar Corporation (Valspar), EPA's emergency response division, and the City of Chicago. The VSI was conducted on July 23 and 24, 1991. It included interviews with representatives of Goodwill (current owner) and Valspar (last known operator) and a walk-through inspection of the site.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 103 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, operational areas, operations, regulatory history, characterization activities, environmental setting, and receptors.

2.1 FACILITY LOCATION

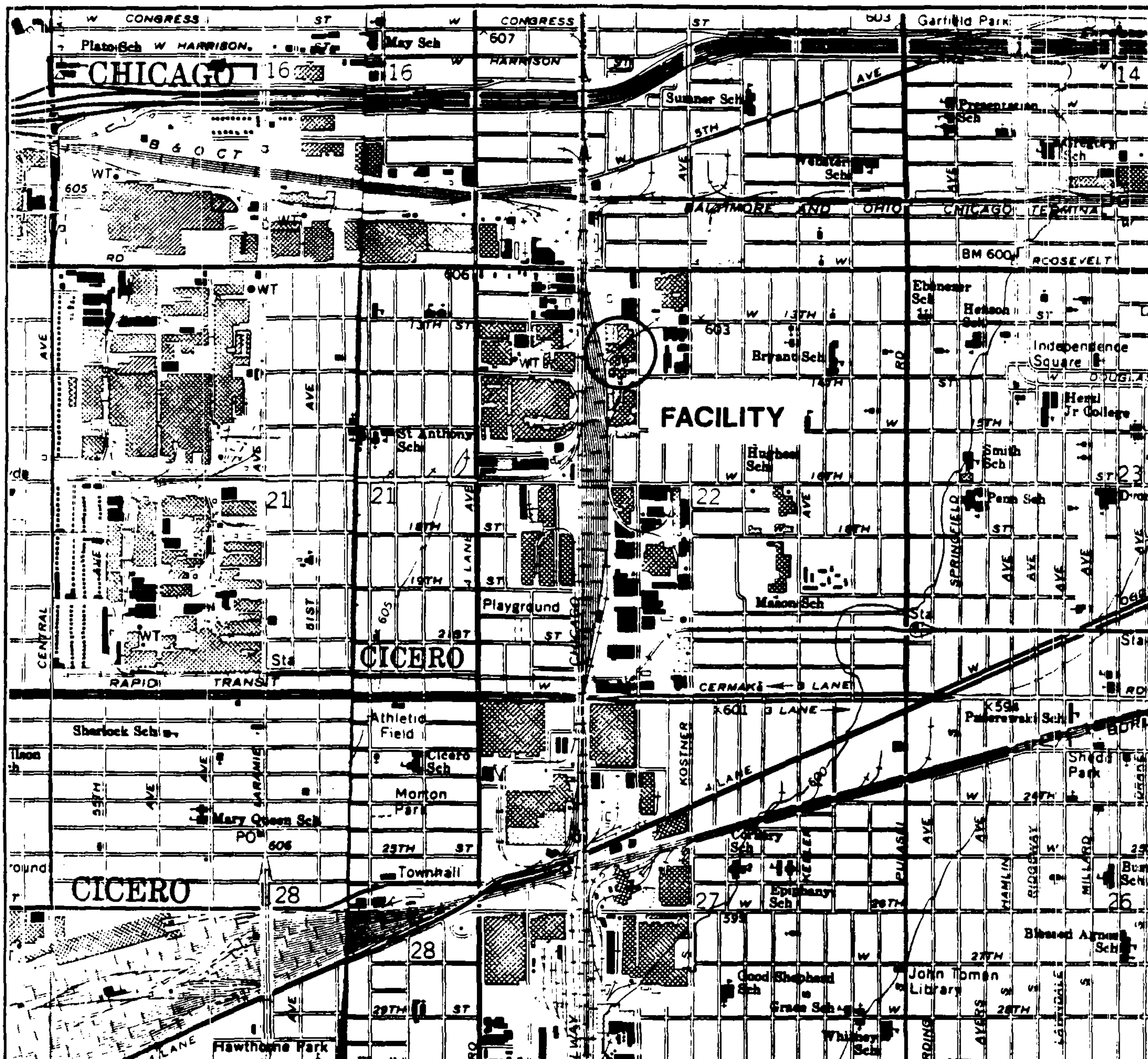
The facility is located at 1330 South Kilbourn Avenue in Chicago, Cook County, Illinois (latitude 41°51'50" N; longitude 87°44'10" W) (see Figure 1). The facility is currently made up of 33 distinct, multi-story buildings. Twelve other buildings located at the southwest end of the facility were not viewed during the VSI because they were burned to the ground during a fire in 1982 (IT, 1990b). The remains of these buildings have been covered with fill material from an unknown source. Some of the building foundations protrude from the fill and can be observed. Other areas in existing building structures were not viewed during the VSI because they were partially demolished in a fire in 1990. Two outdoor, underground storage tank farms occupy the southern portion of the facility. Other underground tank farms are located inside buildings. The facility layout is provided in Figure 2.

The building structures are located on four parcels of land that cover approximately 18.1 acres. A fifth parcel of land was identified in a title search performed in January 1991 (PRC, 1991). The fifth parcel is located across South Kilbourn Avenue from the facility and was not inspected during the VSI. It consists of more than 6.6 acres and appears to be a parking lot. The facility is surrounded by industrial and residential areas.

Armstrong Containers, Inc. (Armstrong Containers), is located to the south of the facility. A residential area is located across the southeast corner from the facility, across 14th Street and South Kilbourn Avenue. A parking lot that is part of the facility is located across South Kilbourn Avenue to the east of the facility. Peoples Gas Light and Coke of Chicago operates a field office to the north of the facility. The Belt Railroad of Chicago railroad tracks border the facility to the west, and industries are located across the railroad tracks to the west. Two currently inactive spurs of this railroad cut through the facility property.

2.2 FACILITY OPERATIONAL AREAS

Valspar was the last operator of the facility and is identified as the facility operator on the facility's RCRA Part A permit application (Valspar, 1980c). Between 1976 and 1984, Valspar leased the facility from a beneficiary of American National Bank and Trust Company of Chicago (American National) Trust Number 75860. American National donated the facility and associated



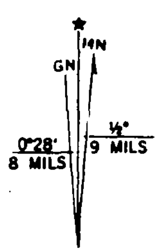
SCALE 1:24000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929
DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS LOW WATER 578.5 FEET



UTM GRID AND 1980 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

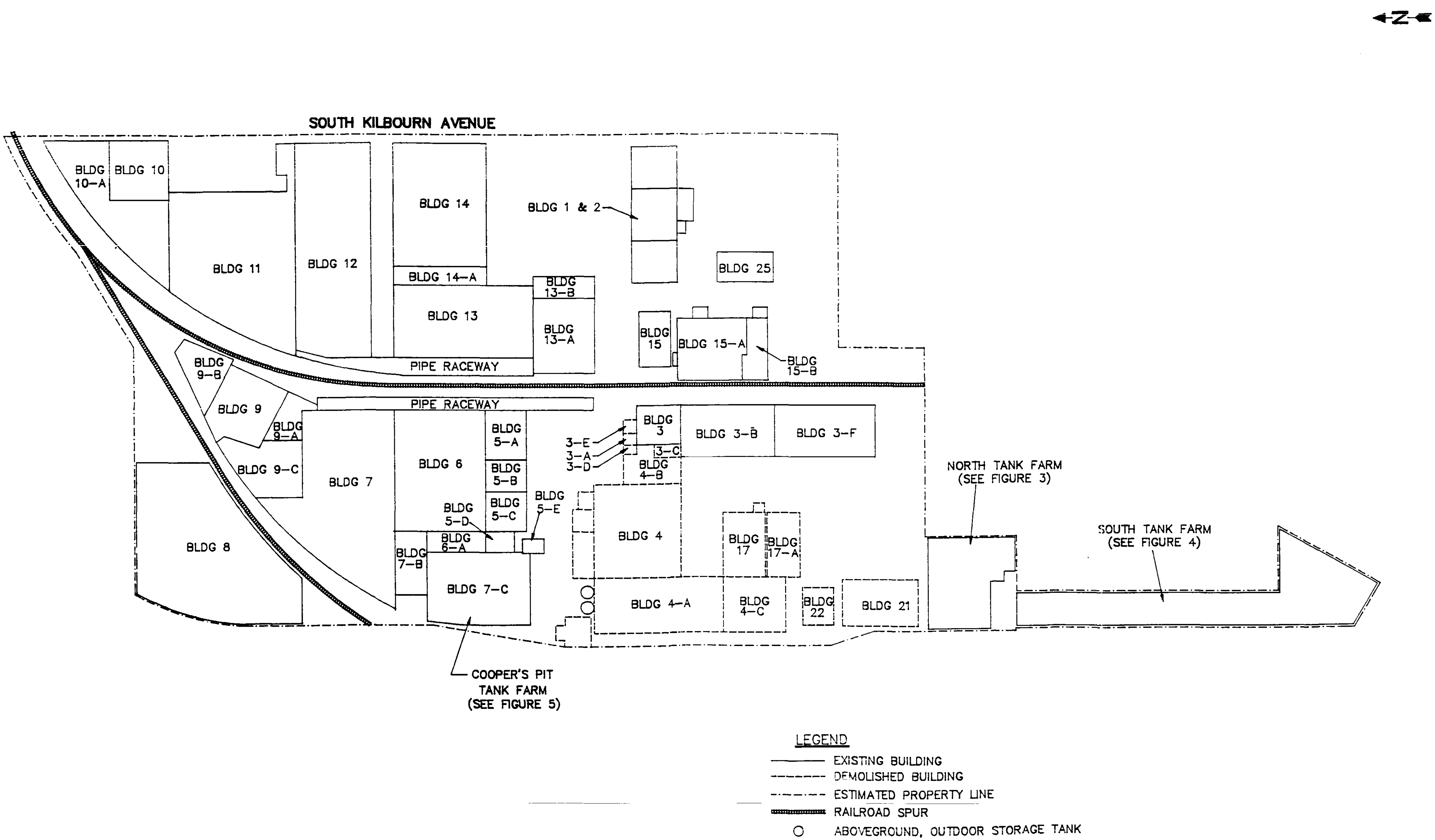
QUADRANGLE LOCATION

SOURCE: U.S.G.S., 1980a; 1980b

1330 SOUTH KILBOURN AVENUE
CHICAGO, ILLINOIS

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.



1330 SOUTH KILBOURN AVENUE
CHICAGO, ILLINOIS

FIGURE 2

FACILITY LAYOUT

NOT TO SCALE

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: ARMSTRONG PAINT & VARNISH WORKS, 1944.

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property to Goodwill in October 1984 (American National, 1984). Since that time, the facility has not been used for any purpose except storage of paper bales. All facility buildings are in various stages of disrepair, and a fire destroyed several buildings in July 1990, nearly 6 years after Valspar left the facility.

The facility is fenced, but PRC observed evidence that unauthorized individuals have entered the facility. This evidence includes items of clothing, magazines, mattresses, and partially full beverage containers located in various buildings throughout the facility. PRC also observed graffiti spray painted on interior walls in many facility buildings. Additionally, Goodwill's legal counsel stated in August 1991, that "Although Goodwill personnel have not been able to identify people inside the facility, it is clear that vandals and transients have occasionally been able to enter the property over a period of years" (Bell, Boyd and Lloyd, 1991b). Goodwill does not provide security other than periodic walking inspections of the facility. Other than the fence surrounding the facility, no access restrictions to any buildings or areas of the facility exist.

The facility is made up of 33 separate, multi-story buildings and two, outdoor, underground storage tank farms. Additionally, 12 buildings were burned to the ground during a 1982 fire (IT, 1990b). Armstrong Paint & Varnish Works, Inc. (Armstrong Paint), numbered each building before 1944 (Armstrong Paint, 1944). Valspar apparently did not change the building numbering system while it operated at the facility, and Goodwill continues to use it. During the PA/VSI, PRC elected to use this numbering system as well. PRC could not determine specific relationships between the building numbers and the operations that may have occurred in those buildings.

Valspar used the buildings at the facility for various purposes, including resin production, resin storage, paint processing, and chemical and raw material storage. Valspar has provided general information about the facility through its contractors in the past, but when PRC requested that Valspar provide specific information, Valspar deferred to documents generated by contractors, stating that "[Valspar surmises] that a large number of the questions that you have asked are addressed in those materials" (Valspar, 1991). The current conditions of the buildings as seen during the VSI are described in detail below. The descriptions are organized into groups of buildings that Valspar used for various purposes. Where possible, PRC uses information gathered during the PA to identify past uses of the buildings. PRC used maps drafted by Armstrong Paint to determine building story heights, areas, and uses, but the base map's date is not legible, and the maps with legible dates all predate the time Valspar used the facility. Therefore, any building uses reported in these maps may not be consistent with Valspar's use of the facility. PRC could not determine the exact areal dimensions of these buildings because detailed, scaled drawings were not provided by Valspar or Goodwill. The maps that were obtained do not indicate scales, or the scales are illegible. Based on unscaled maps PRC located after the VSI, PRC used a planimeter and a known area at the facility to determine approximate building areas.

2.2.1 Resin Production Areas

Valspar produced alkyd resins at the facility from 1976 to 1982, when the resin production buildings caught fire and burned down. Valspar used polymer reactors to produce resins in Buildings 4, 4-A, 4-C, 17, 17-A, and 22 (IT, 1990b). Prior to the time that Valspar used the facility, these buildings were used for material storage and varnish stilling and thinning. PRC did not observe these buildings during the VSI, because their locations were covered with fill material, construction rubble, and vegetation (see photographs 32 and 33). PRC determined that these buildings had a combined, approximate floor space of about 22,400 square feet (see Table 1). Building 4-C was three stories high; Buildings 4 and 4-A were two stories high; and Buildings 17 and 17-A were one story high (Armstrong Paint, date unknown). PRC could not determine the story height of Building 22.

PRC did not locate six other numbered buildings in the same general area as the resin production buildings. These are buildings 3-A, 3-C, 3-D, 3-E, 4-B, and 21. PRC could not determine what activities took place in these building when Valspar used them. Prior to the time that Valspar used the facility, Building 4-B was used for tank storage; PRC could not determine what was stored in the tanks. Raw materials were also stored in Building 21; PRC could not determine what raw materials were stored or the storage methods used to store them (Armstrong Paint, date unknown). The approximate floor areas contained in these buildings are presented in Table 1. Building 21 was one story high (Armstrong Paint, date unknown). PRC could not determine the story height of Buildings 3-A, 3-C, 3-D, 3-E, and 4-B.

The only remaining, standing structures near the former resin production buildings are two, vertical, steel tanks (see photograph 34). These tanks each have a capacity of 20,000 gallons (IT, 1990b). PRC could not determine what these tanks stored.

2.2.2 Resin Storage Areas

Valspar stored resins mixed with nonchlorinated solvents in Buildings 3, 3-B, 5-A, 5-B, 5-C, 6, 6-A, 15-A, and 15-B (IT, 1990b). PRC could not determine the exact areal dimensions of these buildings, because detailed, scaled drawings were not provided by Valspar or Goodwill. Based on unscaled maps PRC located after the VSI, PRC used a planimeter and a known area at

TABLE 1
SUMMARY OF APPROXIMATE BUILDING AREAS

Building/Area	Story Height	Approximate Area (square feet)[a]
Buildings 1 & 2	2	2,800
Building 3	1	1,100
Building 3-A	NA	100
Building 3-B	1	2,300
Building 3-C	NA	200
Building 3-D	NA	70
Building 3-E	NA	100
Building 3-F	2	2,500
Building 4	2	4,000
Building 4-A	2	3,400
Building 4-B	NA	800
Building 4-C	3	1,700
Building 5-A	2	1,100
Building 5-B	1	600
Building 5-C	1	700
Building 5-D	1	200
Building 5-E	2	200
Building 6	1	5,300
Building 6-A	1	580
Building 7	8[b]	8,000
Building 7-B	1	1,100
Building 7-C	1	3,500
Building 8	7	9,300
Building 9	1	2,000

TABLE 1 (Continued)
SUMMARY OF APPROXIMATE BUILDING AREAS

Building/Area	Story Height	Approximate Area (square feet)[a]
Building 9-A	2	600
Building 9-B	1	1,100
Building 9-C	2	1,700
Building 10	2	1,700
Building 10-A	1	3,600
Building 11	2[b]	9,000
Building 12	7[b]	7,300
Building 13	4[b]	4,900
Building 13-A	2	1,900
Building 13-B	2	700
Building 14	5[b]	5,700
Building 14-A	2	800
Building 15	1	940
Building 15-A	1	2,100
Building 15-B	1	730
Building 17	1	1,200
Building 17-A	1	940
Building 21	1	1,669[c]
Building 22	NA	400
Building 25	1	870
North Tank Farm	--	4,400
South Tank Farm	--	7,500

TABLE 1 (Continued)
SUMMARY OF APPROXIMATE BUILDING AREAS

Notes:

NA = Not Available.

[a] PRC used a planimeter and a known area inside the facility to approximate areas of buildings and tank farms. The areas presented in this table are approximate and should be used only to compare the relative areas of buildings or tank farms.

[b] The number of stories in this building includes a basement.

[c] The exact, numerical area of Building 21 is provided on a map obtained by PRC after the VSI (Armstrong Paint, 1961).

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the facility to determine that these buildings have a combined, approximate floor space of about 15,600 square feet (see Table 1).

Building 3 is a one-story building located near the south-central part of the facility (see photographs 19, 20, and 21). It is flanked by a railroad spur to the east. Because the facility lacks electrical power, the building was dark when PRC performed the VSI. Using flashlights, PRC identified 11 tanks in this building. The had volumes ranging from 2,000 to 6,000 gallons (IT, 1990b). PRC was able to look inside the base of one of the tanks, and it contained a thick, viscous, dark substance that Valspar stated during the VSI may be varnish. The room was littered with debris. PRC identified a small trench about 1 foot wide and 10 feet long. The trench was filled with a material that appeared to be straw or grass, so PRC could not determine the depth of the trench. Near the west end of the building, PRC observed a dark substance on the floor. A number of pipes over this substance indicated that the substance may have dripped from the pipes onto the floor. The spill area is about 3 feet long and several inches wide. The building has a high ceiling, perhaps more than 20 feet above the floor. PRC determined that this building has a floor space of about 1,100 square feet (see Table 1).

Building 3-B is a one-story building located south of Building 3 (see photographs 22, 23, 24, and 25). The building is recessed into the ground, and PRC walked down about 10 feet of metal stairs into the building. The floor was covered with rust-colored sludge, piping insulation, and other debris, and these materials were saturated with liquid. Trenches running along the length and width of the room were filled with liquid. Because the trenches were full of liquid and because PRC could not see well due to the darkness in the building, PRC became concerned about the safety of its inspection team and did not fully explore this building. Based on the layout of the building, PRC tentatively identified 18 tanks. Information provided to PRC after the VSI indicates that 18 tanks ranging in volume between 8,000 and 20,000 gallons are located in Building 3-B (IT, 1990b). PRC believes that the ceiling may be as high as 40 feet above the floor of the building. PRC determined that this building has a floor space of about 2,300 square feet (see Table 1).

Building 5-A is located near the center of the facility west of a railroad spur that cuts through the property (see photograph 50). It is a small, two-story building. PRC identified five tank units in this building, but information provided to PRC after the VSI indicate that a total of 11 tanks were located in this building when Valspar operated at the facility. These tanks range in volume between 50 and 2,500 gallons (IT, 1990b). Because tank units in several buildings contain more than one tank, PRC believes it observed all 11 tanks and that several tanks may be located in shells containing more than one tank. The floor of this building was littered with debris. The ceilings appeared to be about 10 feet from the floor on both stories. PRC determined that each floor of this building has an estimated floor space of about 1,100 square feet (see Table 1).

Building 5-B is a one-story building located west of Building 5-A (see photograph 51). PRC identified two tank units in this building; however, information provided to PRC after the VSI indicates that a total of four tanks were located in this building when Valspar operated at the facility. These tanks range in volume between 500 and 2,250 gallons (IT, 1990b). Because tank units in several buildings contain more than one tank, PRC believes it observed all four tanks and that three tanks may be located within a common tank shell. The smaller of the two tank units had been cut open, probably as part of a removal action initiated in 1985. The ceiling of this building appeared to be about 20 feet above the floor. PRC determined that this building has a floor space of about 600 square feet (see Table 1).

Building 5-C is a one-story building located west of Building 5-B (see photograph 52). Entrance to the building is made through a door on its south side, and a set of stairs leads about 5 to 10 feet down to the floor. PRC observed tank units in this building, but PRC could not count the number of tanks from the doorway into the building. PRC did not enter this small building because the floor was covered with a dark, brownish-red liquid with oily scum floating on it. PRC estimated that the liquid was about 2 to 3 feet deep based on the level of the liquid against the tank valves. The room was littered with metal piping protruding from the liquid and tanks. Information provided to PRC after the VSI indicates that a total of eight tanks were located in this building when Valspar operated at the facility. These tanks range in volume between 9,000 and 9,250 gallons (IT, 1990b). The ceiling of this building appeared to be about 25 feet above the liquid level. PRC determined that this building has a floor space of about 700 square feet (see Table 1).

Building 6 is a one-story building located to the north of Buildings 5-A, 5-B, and 5-C (see photographs 46 and 47). Five east-west rows of tanks run the entire length of the building. Two rows running along the north and south walls of the building and one row running down the middle of the building consist of tanks resting on the building floor. The other two rows of tanks are elevated on steel beams over the walkways between the other rows. Catwalks running along the elevated tank rows were observed, but the ladders and portions of the metal grating that made up the catwalks had been removed. Goodwill reported that vandals had cut the catwalks down for their scrap metal value. The floor of the building was littered with debris, including about four bags of what appeared to be used personal protective equipment (PPE). PRC also observed resinous puddles on the floor. Leaks of an orange-brown substance from the elevated tanks were slowly forming what may best be described as chemical stalactites. Goodwill stated that these stalactite-like deposits break off every winter when it is cold and return every summer when it is warm. PRC observed that some tanks had been cut open and drained. These tanks appeared to be empty. PRC did not count the number of tanks in this room because it could not identify the elevated tanks. Information provided to PRC after the VSI indicates that a total of 104 tanks were located in this building when Valspar operated at the facility (IT, 1990b). Because the tanks were crowded uniformly together against the walls and above the floor, PRC believes that no tanks have been removed from this building. These tanks range in volume between 800 and 8,000 gallons (IT, 1990b). Most tanks have capacities of about 2,500 gallons. The ceiling in this building appeared to be about 20 to 30 feet above the floor. PRC determined that this building has a floor space of about 5,300 square feet (see Table 1).

Building 6-A is a one-story building located west of Building 6 (see photographs 48 and 49). PRC observed three tanks on an elevated catwalk in this building. For safety reasons, PRC did not attempt to access the catwalk. The floor of the building was littered with debris and puddles of a yellow, resinous substance that appeared to be leaking from two overturned buckets. Information provided to PRC after the VSI indicates that a total of three tanks were located in this building when Valspar operated at the facility. These tanks range in volume between 150 and 350 gallons (IT, 1990b). The ceiling in this building appeared to be about 20 feet above the floor. PRC determined that this building has a floor space of about 580 square feet (see Table 1).

Building 15-A is a one-story building located in the south-central portion of the facility (see photograph 14). The building's floor was littered with debris and dust, but the building appeared empty. Paint was peeling off the walls and columns in this building, and piping insulation was observed on the floor and wrapped around pipes running along the building's walls. PRC did not observe any tanks in this building, but information provided to PRC after the VSI indicates that Valspar used three tanks in Building 15-A. However, these tanks were removed prior to 1985 (IT, 1990b). The ceiling of this building appeared to be about 30 to 40 feet above the floor. PRC determined that this building has an estimated floor space of about 2,100 square feet (see Table 1).

Building 15-B is a one-story building located south of Building 15-A (see photographs 8, 9, 10, and 11). The floor of this building was coated with several inches of thick, viscous materials. Some of the material was dark in color, and some of it was milky white. Scrap metal equipment, dark rust-red stains, and scrap wood were observed resting in the puddles of material. PRC observed five tanks in this building. Information provided to PRC after the VSI indicates that Valspar used five tanks in Building 15-B. These tanks have volumes ranging between 2,100 and 4,500 gallons (IT, 1990b). The tanks are all located against the south wall of this building, and an east-west walkway runs along the north side of the tanks. The ceiling appeared to be about 20 feet above the floor. PRC determined that this building has an estimated floor space of about 730 square feet (see Table 1).

2.2.3 Paint Process Areas

Valspar produced paint and other coatings during its period of operation at the facility primarily in Buildings 7, 8, 10, 11, 12, and 13. Because Buildings 14 and 14-A are located near these buildings and because most of those two buildings were burned in a 1990 fire, they are discussed in this section. Building 10-A consists of only one floor attached to Building 10, so it is discussed in this section as well. PRC could not determine the exact areal dimensions of these buildings because detailed, scaled drawings were not provided by Valspar or Goodwill. PRC determined that these buildings have a combined, approximate floor space of about 222,000 square feet (see Table 1).

Building 7 is a seven-story building with a basement. It is located between the two railroad spurs running through the north end of the facility. Building 8 is a seven-story building located north of Building 7. It does not have a basement. Building 10 is a two-story building located near the northeast corner of the facility. It also does not have a basement. Building 11 is a one-story building with a basement located south of Building 10. Building 12 is a six-story building with a basement located east of Building 7 and south of Building 11. Building 13 is a three-story building with a basement located south of the western end of Building 12 (Armstrong Paint, date unknown). Unless otherwise noted, the story heights for each floor of these buildings is about 10 feet.

The discussion of these buildings is organized by floor instead of by building because on several stories, these buildings are joined together.

2.2.3.1 Basement Level

Information provided to PRC after the VSI indicates that Valspar did not use any tanks in the basement of Building 7 (IT, 1990b). Prior to the time Valspar leased the facility, the basement of Building 7 was used to store "industrial S's" and drums (Armstrong Paint, date unknown). PRC could not determine what an industrial S is or was or what types of drums were stored in the basement. PRC determined that this building has a floor space of about 8,000 square feet (see Table 1). PRC did not observe the basement of Building 7 during the VSI because it did not locate any accessways to that level. Goodwill did not indicate that this building contained a basement level during the VSI.

The basement of Building 11 contains several distinct areas. The floors in each area appeared to be relatively clean in comparison to other floors in the facility. PRC determined that this building has a floor space of about 9,000 square feet (see Table 1).

PRC observed a rectangular hole in the north wall near the northeast corner of the Building 11 basement. The basement was dark, and flashlights did not provide enough light to view the entire contents of the space behind the north wall. PRC observed parts of two vertical tanks and one horizontal tank behind the hole. These tanks were partially covered with soil. PRC attempted to view the area west of the observed tanks but would have had to climb up to the hole and lean into it. PRC did not perform this activity because of safety concerns.

A floor trench runs generally north-south along the western end of the basement of Building 11. The 1-foot wide trench is at least 30 feet long. It contained several inches of standing liquid during the VSI. The trench was about 6 to 8 inches deep. PRC could not determine the purpose of this trench.

Four tanks are located at the south end of the basement of Building 11. The tanks are horizontal and are aligned in a north-south direction. Using tank gauges located next to the tanks, PRC estimated the volumes of the tanks to be about 10,000 gallons each. Information provided to PRC after the VSI indicates that four 4,000-gallon tanks are located in the basement (IT, 1990b). PRC is not sure why this discrepancy exists. An orange-colored, viscous material was leaking from a pipe near the tanks onto the machinery beneath it.

PRC observed two distinct areas in the basement of Building 12 (see photographs 75, 76, and 77). The first area is located along the east wall of the basement. Three, rectangular tanks are located here. These tanks are labeled as "Caustic." Debris was scattered about the tanks, including dust and pipe insulation. Information provided to PRC after the VSI indicates that these three 1,200-gallon tanks contained caustic wastewater (IT, 1990b).

At the west end of the Building 12 basement is a small room. To the east of the room's entrance are three pits with openings about 2 feet in diameter. Each pit contained liquid to a level about 1 to 2 feet below the concrete floor. PRC could not determine the depths of the pits. Inside the room, PRC observed three transformers and other electrical equipment. Because the floor in this room was damp, oily, and contained several inches of a sludge-like material in places, PRC did not enter the room. Oily stains were noted on the walls inside and outside this room. On the floor of this room, PRC observed what appeared to be pipe insulation soaking up some of the oily material. PRC determined that this building has a floor space of about 7,300 square feet (see Table 1).

The basement of Building 13 was mostly empty during the VSI (see photograph 78). PRC observed one, rusty drum resting against a column in the basement. The drum was tightly sealed, so PRC could not determine the contents of the drum. The floor of the basement was covered with debris and wet stains. The wet stains covered an area of approximately 50 to 75 square feet. PRC entered a pipe raceway through a door on the west side of the basement. The raceway appeared to be empty except for miscellaneous debris, but PRC did not walk the length of the raceway. PRC determined that this building has a floor space of about 5,600 square feet (see Table 1).

PRC observed a pit near the west end of the basement of Building 14 (see photograph 80). The pit was filled with a dark, translucent liquid. PRC observed a plastic pole in the pit, which Goodwill claimed was at least 15 feet deep. During the VSI, the floor of the Building 14 basement was covered with debris, including wood and an unknown, light-colored powder. PRC determined that this building has an estimated floor space of about 5,700 square feet (see Table 1).

The basement of Building 14-A contained a room filled with liquid to a depth of several inches (see photograph 79). PRC could not determine the source of the liquid. PRC observed 11 drums and other containers in this room. PRC did not cross the room to read the labels on the containers because of safety considerations. The walls in this room were stained with a light-colored, oily substance and a darker, streaked material. PRC determined that this building has a floor space of about 800 square feet (see Table 1).

2.2.3.2 First Floor

The first floor of Building 7 is an empty room (see photographs 41 and 42). PRC observed standing liquid near the middle of the room covering about half of the floor. The west wall of the room contained graffiti. The paint on the columns, walls, and ceiling of this room was peeling and had chipped and fallen to the floor in many places. PRC observed a drum containing a light-colored, semisolid substance lying on its side during the VSI. The drum was resting in an area containing standing liquid and heavy discoloration of the walls and floor. PRC determined that this building has an estimated floor space of about 8,000 square feet (see Table 1).

A wall divides the first floor of Building 8 into two areas (see photographs 59, 60, 61, 62, 63, 64, and 65). PRC observed seven 55-gallon drums, white powders, oily stains, and standing liquid in the southern section of the floor. Using a photoionization detector (PID), PRC determined that several of the drums contained volatile constituents. In a small room at the southwestern corner of the building, PRC observed a rusted, rectangular tank. Beneath the tank were a number of white, crystalline piles, but PRC did not attempt to determine the nature of this substance. A drain was observed in the middle of the small room. In an engine room located in the northern corner of the building, PRC observed two engines and various electrical equipment associated with the engines. Trenches located beneath each engine shaft were all filled with an oily liquid during the VSI. The floor in the engine room is covered with white dust, oily liquids, and miscellaneous debris. PRC observed six 55-gallon drums in this room. Using a PID, PRC determined that several of the drums contained volatile constituents. PRC estimated that Building 8 has a floor space of about 9,300 square feet (see Table 1). Approximately 1/3 of this area is contained in the engine room.

The first floor of Building 10 contains four tanks hidden behind two doorways (see photograph 68). The floor of the building is covered with debris, including white powder and oily stains. PRC observed piping insulation and chipped paint lying on the floor. Information provided to PRC after the VSI indicates that a total of eight tanks were located in this building when Valspar operated at the facility. These tanks range in volume between 60 and 8,000 gallons (IT, 1990b). Four of these tanks are identified as having volumes of 8,000 gallons, and PRC believes that the tanks behind the doorways contain comparable volumes. PRC did not locate the other four tanks alleged to be present, although PRC believes that three of those tanks may be located in Building 10-A. PRC could not determine the location of the eighth, 60-gallon tank. PRC determined that Building 10 has an estimated floor space of about 1,700 square feet (see Table 1).

The first floor of Building 10-A contains three cylindrical tanks and one drum (see photographs 66 and 67). The floor was covered with debris, including pools of standing liquid, white dust, and paint chips. Several of the windows on this floor of Building 10-A were boarded up. According to information provided to PRC after the VSI, no tanks were located in this building (IT, 1990b). However, Building 10-A is attached to Building 10, and PRC believes that the three tanks that it observed may be three of the tanks identified as present in Building 10. PRC determined that Building 10-A has a floor space of about 3,600 square feet (see Table 1).

The first floor of Building 11 contains a conveyor belt along the west and north walls (see photographs 69 and 70). The floor of the building was covered with dust and miscellaneous debris. PRC identified at least two holes in the floor. Plywood sheets had been placed over the holes to prevent anyone from falling into them, according to Goodwill. PRC observed one tank on the first floor of Building 11. The tank appeared to be a 20-cubic-yard roll-off box with a fitting placed over a hole in its top to allow for filling and emptying operations. The ceiling of the building was coated with chipping paint, and piping and piping insulation were beginning to sag from the ceiling and the walls. The ceiling of the building was about 25 to 30 feet above the floor. PRC determined that Building 11 has a floor space of about 9,000 square feet (see Table 1).

The first floor of Building 12 was empty, and except for some debris on the floor, PRC did not observe anything of note on this floor. PRC determined that Building 12 has a floor space of about 7,300 square feet (see Table 1).

PRC observed extensive fire damage on the first and higher floors of Buildings 13, 14, and 14-A (see photographs 81, 86, 97, and 105). Therefore, PRC did not enter those buildings above the basement level. Valspar stated during the VSI that these buildings were used for office space. Before Valspar used the facility, these buildings were also probably used for office space (Armstrong Paint, date unknown).

2.2.3.3 Second Floor

The second floor of Buildings 7 and 8 are joined together. The second floor of these buildings was empty except for debris covering the floor, including chipped paint and dust. PRC determined that the second floor of Buildings 7 and 8 has an approximate, combined floor space of about 17,300 square feet (see Table 1).

PRC did not observe the second floor of Building 10, because PRC did not locate an accessway to this floor. Goodwill did not indicate that a second floor existed, and PRC did not notice any signs of this floor of Building 10. Information provided to PRC after the VSI indicates that this floor exists (IT, 1990b). PRC determined that Building 10 has a floor space of about 1,700 square feet (see Table 1).

The second floor of Building 12 contained a conveyor belt (see photograph 82). Other than some debris on the floor, PRC did not observe anything of note on this floor of the building. PRC determined that Building 12 has a floor space of about 7,300 square feet (see Table 1).

PRC observed the second floor of Buildings 13 and 14 through a doorway into Building 14 from Building 12. The buildings were gutted by a fire in August 1990, and PRC did not enter the room because of safety concerns (see photographs 81, 86, 97, and 105).

2.2.3.4 Third Floor

On the third and higher floors, Buildings 7, 8, and 12 are all joined together. The connections are made over the railroad spurs that pass between these buildings on the lower floors. While climbing the stairs from the second to the third floors in Building 12, PRC observed pails containing a grey powder on the stairwells. PRC could not determine the contents of the pails. Signs above the pails read "Foam Powder." PRC determined that Buildings 7, 8, and 12 have a combined floor space of about 24,600 square feet on each floor (see Table 1).

PRC observed 20 tanks on the third floor of Building 7 (see photograph 87). These tanks were aligned in rows along the south, west, and north walls of the building. They had been painted various colors, and most of the paint on the tanks was peeling off at the time of the VSI. The tops of many of the tanks were open, and PRC observed paint residues in almost all of the 20 tanks. The paint residues were coated on the bottom, walls, and top of each tank. PRC could not determine the thickness of the paint residues. Three tanks that did not contain paint residues had been cut open and apparently cleaned. Information provided to PRC after the VSI indicates that Valspar used 20 tanks and one small glue pot on the third floor of Building 7. The tanks have volumes ranging between 450 and 1,600 gallons (IT, 1990b). The paint on the ceiling and walls of the room was chipping off. The floor was covered with debris, including dust, paint chips, spilled paint, and glass.

PRC observed 18 tanks on the third floor of Building 8 (see photographs 88, 89, and 90). All but one of the tanks were aligned against the south and west walls. The other tank was located in the center of the building. PRC noted that at least six of the tanks in this room had been cut open and drained. Information provided to PRC after the VSI indicates that Valspar used 18 tanks on the third floor of Building 8. The tanks have volumes ranging between 550 and 1,600 gallons (IT, 1990b). The paint on the ceiling and the tanks was chipping off, and the paint chips were contributing to the debris on the floor. Other debris included dust and glass. The walls of the room contained graffiti. According to Goodwill, a mattress was once located in the northern section of the building, but PRC did not see the mattress.

PRC observed a row of 22 multicolored tanks along the north wall of Building 12 (see photographs 83, 84, and 85). The bottom portions of the tanks were painted blue, white, yellow, or green. PRC observed that materials had leaked from at least two of these tanks to the floor. PRC observed another tank located near a doorway through the west wall in the southwest corner of the room. PRC also observed one 30-gallon, rusty drum. Information provided to PRC after the VSI indicates that Valspar used 24 tanks on the third floor of Building 12. Twenty-three of these tanks have volumes ranging between 900 and 1,600 gallons. The other tank has a volume of 30 gallons and probably corresponds to the drum that PRC observed (IT, 1990b).

2.2.3.5 Fourth Floor

PRC observed only one tank on the fourth floor of Buildings 7, 8, and 12. It was located in Building 12. Information provided to PRC after the VSI indicates that Valspar used only one tank on the fourth floor of these three buildings. The tank has a volume of 800 gallons (IT, 1990b).

PRC observed holes in the floor of Building 7 that may have once been used to pipe paint mixtures from one level of the building to another. PRC also observed three large ball mills on this floor of Building 7. Based on its inspections of other paint companies, PRC believes these ball mills would have been used to grind the pigments in Valspar's paint formulations.

The fourth floor of Building 8 appears to have been used as a laboratory (see photograph 93). Counters were laid out throughout a series of rooms in the building. The glass in one door had the words "Chemical Lab" painted on it. The ceiling and top several feet of the walls in one of the rooms in Building 8 contained smoke damage. Goodwill stated that vandals had probably burned the coatings from wires in order to collect the copper for its scrap value.

PRC observed one tank along the south wall on the fourth floor of Building 12 (see photographs 91 and 92). PRC did not observe any standing liquids in the tank. Information provided to PRC after the VSI indicates that Valspar may have used the 800-gallon tank as part of a caustic cleaning system (IT, 1990b). PRC observed holes in the floor of Building 12 that may have once been used to pipe paint mixtures from one level of the building to another. The floor in all three buildings was covered with debris, including dust, dried paint, and deteriorated piping insulation.

2.2.3.6 Fifth Floor

PRC observed four tanks located in the southeast corner of the fifth floor of Building 7 (see photographs 100 and 101). PRC also observed one overturned tank located against the north wall of the building near a weigh scale. Information provided to PRC after the VSI indicates that Valspar used four tanks on the fifth floor of Building 7. The identified tanks include three of the tanks located against the north wall and the overturned tank. The identified tanks have volumes of 500 gallons each (IT, 1990b; Kinsey Consulting, Inc. (Kinsey), 1987). One tank located in the southeast corner is not accounted for in this information. Additionally, PRC observed a blue, rectangular tank about 15 feet long, 5 feet high, and 3 feet wide that was labeled "Dust Suppressor" against the north wall of the building. The floor of the building is covered with debris, including dust, paint chips, and dried paint.

The fifth floor of Building 8 was empty except for one vat about 3 feet in diameter and several feet deep located in its southwest corner (see photographs 102 and 103). The vat contained chairs and was not discussed in information provided to PRC after the VSI (IT, 1990b). The building contained scattered debris, but the floor was relatively clean in comparison to the remainder of the buildings on the fifth floor. Graffiti was painted on the walls of this building.

The fifth floor of Building 12 contained one open drum of a yellow, resinous material (see photographs 94, 95, 96, 98, and 99). It appeared that the contents of the drum had leaked to the floor below it. PRC also observed an overturned bucket of orange, resinous material that appeared to have spilled from the bucket to the floor. The floor was covered with dust and debris, and many of the building's lighting fixtures had fallen partially or completely from the ceiling. PRC observed three tanks on the fifth floor of Building 12, and information provided to PRC after the VSI also indicates that Valspar used three tanks on the fifth floor of Building 12. The tanks each have a volume of 500 gallons (IT, 1990b). PRC also observed a thick, orange, resinous material leaking from a pipe near the south wall. The material leaking from the pipe had formed a puddle on the floor beneath its opening. PRC observed a blue tank about 15 feet long, 5 feet high, and 3 feet wide that was labeled "Dust Suppressor" located near the leaking pipe against the south wall of the building. A stairway leading down into Building 14 from Building 12 was also observed. The stairway was not completely intact because of the fire that destroyed Building 14 in 1990.

2.2.3.7 Sixth Floor

The sixth floor of Buildings 7 and 8 are empty except for small, stagnant pools of standing liquid containing what appeared to be green algae (see photograph 107). Debris is scattered about the floor of both rooms, including paint chips and piping insulation.

The sixth floor of Building 12 was damaged by a fire (see photograph 104). PRC found no discussion of a fire in this building in any documents reviewed during the PA. The sixth floor appears to have contained an office space. PRC observed the remains of filing cabinets and desks. One empty drum was found in this room. Stairs lead from the sixth floor of Building 12 to a penthouse above the building. The penthouse appears to have been a residence, and it was equipped with a kitchen, several rooms, and a restroom. During the VSI, Goodwill speculated that the penthouse was used by Valspar executives visiting Chicago for meetings.

2.2.3.8 Seventh Floor

The seventh floor of Buildings 7 and 8 are empty except for debris scattered about the floor, including piping insulation. This floor was relatively clean compared to many of the other floors of these buildings.

2.2.4 Chemical and Raw Material Storage Areas

Valspar stored various chemicals and raw materials during its period of operation at the facility in Buildings 1, 2, 3-B, 4, 5-A, 5-B, 5-C, 5-E, 6, 7, 7-C, 8, 10, 10-A, 11, 12, 13, 14, 15-A, 15-B, and two tank farms. Most of these buildings have been detailed above. Buildings 1 and 2, 5-E, 7-C, the North Tank Farm, and the South Tank Farm are described in this subsection.

Buildings 1 and 2 form a single, two-story building complex (see photographs 1, 2, 3, 4, 43, 44, and 45). The complex is located near the southeast corner of the facility. Three rooms form the interior of each level of the complex, and one stairway leads from the first to the second floors in the western room. The floors of the six rooms in this complex were littered with trash, including beverage containers and magazines. PRC observed a tacky, black substance in the first floor's eastern room. In the first floor's western room, PRC observed three plastic bags full of used PPE that had been ripped open. One tank was located in this room. Information provided to PRC after the VSI does not identify this tank (IT, 1990b). On the second floor of the buildings, PRC observed approximately 20 feet of pipe covered with piping insulation in the western room. Several dark, wet areas were observed in the middle room, which contains a relatively smaller, walled-off room with a heavy, sliding door. PRC observed several, empty, metal racks in this room. The paint on the walls and ceiling throughout the entire building was peeling and had contributed to the litter on the floors. PRC determined that Buildings 1 and 2 have a total floor space of approximately 5,600 square feet (see Table 1). PRC observed a small storage shed south of Buildings 1 and 2. The shed's floor was covered with small, empty paint cans and other, miscellaneous scrap metal.

Building 5-E is a two-story building located southwest of Building 5-C. The first floor contained standing liquids and smelled slightly of solvents. PRC observed light-colored, resinous materials on the first floor. The second floor of the building was covered with dirt and broken, porcelain toilets, although this building did not appear to have been used as a restroom. PRC determined that Building 5-E has a total floor space of approximately 400 square feet (see Table 1).

Building 7-C is referred to in the information obtained during the PA as the "Cooper's Pit" (see photographs 35, 36, 37, 38, and 39). This one-story building has a ceiling that is perhaps 30 feet high. The floor of the building appeared to be dirt, and PRC observed at least three pits that Goodwill described as tank openings. PRC observed standing liquid as high as the openings in two of these pits. PRC also observed wooden plywood sheeting laid on the floor at intervals. Goodwill stated that the plywood sheeting covered tank openings to prevent accidents. PRC did not lift the plywood sheeting to observe any of the tanks for safety reasons. Information provided to PRC after the VSI indicate that the Cooper's Pit contains 15 tanks ranging in volume between 4,050 and 25,000 gallons. The tanks in the Cooper's Pit were used to store solvents used in paint production (IT, 1990b). Articles of clothing were strewn about the Cooper's Pit, and the floor of the building was covered with dust, chipped paint, paint spills, and hundreds of drum bungs. The walls of the building were covered with peeling paint and what appeared to be splashes and streaks of dark substances. An aboveground piping raceway located outside the west end of the Cooper's Pit was leaking thick, yellow and orange, resinous material onto the ground. The ground below the leak was covered with several inches of a jelly-like, yellow substance with a mottled, yellow-brown, hard skin. PRC determined that the Cooper's Pit has a floor space of approximately 3,500 square feet (see Table 1).

Two underground tank farms are located along a thin, north-south trending strip of land beginning at the southwest corner of the facility. The strip of land abuts Armstrong Containers on that facility's western end. The tank farms are divided into a North Tank Farm and a South Tank Farm. Piping raceways emanating from both tank farms appeared to lead to the facility and to Armstrong Containers, located to the south of the facility. Valspar stated during the VSI that the pipelines to Armstrong Containers were cut off when Valspar used the facility. In the main tank areas, the soil was covered with a thick growth of vegetation. However, underneath the pipelines in both tank farms, PRC observed stressed vegetation. No soil discoloration was noted.

The North Tank Farm appears to be diked with concrete walls (see photographs 30 and 31). The ground making up the top of the tank farm is located at the top of these walls, and PRC accessed the tank farm by climbing a ladder about 5 feet to the top of the southern wall. Accessways and fill pipes into the tanks can be seen throughout the North Tank Farm. Information provided to PRC after the VSI indicates that the North Tank Farm contains 15 tanks ranging in volume between 2,500 and 8,000 gallons, with 12 of the tanks having capacities of 8,000 gallons. These tanks were used to store solvents when Valspar used the facility (IT, 1990b). PRC determined that the North Tank Farm contains an area of approximately 4,400 square feet (see Table 1).

The South Tank Farm appears to be diked with concrete walls along its north and west ends (see photograph 29). The foundation of Armstrong Containers abuts its east end, and the south end does not appear to be contained. PRC accessed the South Tank Farm by climbing down a ladder on the southern end of the North Tank Farm about 5 feet to the soils above the tank farm. Accessways and fill pipes to tanks can be seen throughout the South Tank Farm. Information provided to PRC after the VSI indicates that the South Tank Farm contains 17 tanks with volumes of 8,000 gallons. One other tank contains a volume of 10,000 gallons. These tanks were used to store solvents, paint-related oils, and fuel oils during the time that Valspar used the facility (IT, 1990b). PRC determined that the South Tank Farm contains an area of approximately 7,500 square feet.

2.2.5 Other Areas

PRC observed several other areas during the VSI. These areas were not addressed specifically in the documents obtained during the PA. They consist of Buildings 3-F, 7-B, 5-D, 9, 9-A, 9-B, 9-C, 13-A, 13-B, 15, and 25; a spill area east of Building 25; a location that may have once contained a transformer; the railroad spurs; and many piping raceways.

Building 3-F is a two-story building located south of Building 3-B (see photographs 26, 27, and 28) (Armstrong Paint, date unknown). However, PRC only observed one story in this building because PRC did not locate a stairway into the second floor. Near the north end of the building, PRC observed electrical equipment, including at least one transformer. Oily material was pooled around some of this equipment, and the floor was quite sticky. PRC observed at least two bags of used PPE in Building 3-F. Goodwill stated that it believed this building was used as a command base by cleanup personnel during past removal activities at the facility. These removal activities are discussed in subsections 2.4 and 2.5 of this report. The building's interior was trenched along all four walls. The trench was about 6 inches deep and 4 to 6 inches wide. A sump located near the north end of the building appeared to be connected to the trench network. The sump is approximately 2 feet in diameter and contained standing liquid about 2 feet below floor level. Because of the liquid's presence, PRC could not determine the depth of the sump. PRC noted deteriorated piping insulation in this building, and one small bucket near the middle of the building was resting on its side. The contents of the bucket consisted of a black, oily material that had spread in a small puddle about 3 feet in diameter around the bucket. PRC determined that each floor of Building 3-F contains an area of approximately 2,500 square feet (see Table 1).

Building 5-D is a small, one-story building located west of Building 5-C (see photographs 53 and 54). PRC observed one drum inside and one drum outside this building. Using a PID, PRC determined that both drums contain volatile constituents. Both drums were slightly rusted, and neither drum was sealed. Debris was observed inside and outside this building. PRC determined that this building contains a floor space of approximately 200 square feet (see Table 1).

Building 7-B is a one-story building located north of the Cooper's Pit (Building 7-C) (see photograph 40). Maps obtained after the VSI indicate that this building was formerly called the "Cooper's Shop" (Armstrong Paint, date unknown). This building contained three empty drums, and PRC observed one pair of rubber PPE outerboots in this building. The floor contains a shallow, east-west trench that was empty except for dust and powders. PRC observed peeling paint and deteriorated piping insulation in this building. PRC determined that this building contains an area of approximately 1,100 square feet (see Table 1).

The complex of Buildings 9, 9-A, 9-B, and 9-C appear to have been used as the source of power for the facility when it was operational (see photographs 55, 56, 57, and 58) (Armstrong Paint, date unknown). Building 9-A and 9-C are two-story buildings, and the other two buildings are one-story structures. The first floors of these buildings all contain electrical equipment in various stages of disrepair. PRC observed at least two boilers, one engine, and several control panels that had been partially torn from the wall. The engine was resting in a brown liquid with oily sheens on its surface. PRC observed pools of black, oily materials near the west end and in the center of Building 9-C and oily stains on the walls and floors in all the buildings. PRC observed one empty drum in Building 9-A. The floor of every building was covered with debris and rubble piled to 1 foot high in places. The rubble consisted of concrete, metal, and wood scraps, white powders, dust, and chipped paint from the walls and ceiling. PRC also observed deteriorated piping insulation in these buildings. PRC observed two sealed, 55-gallon drums in Building 9. The ceilings in Buildings 9 and 9-C were quite high, approximately 30 to 50 feet above the floor level in places. Information obtained by PRC after the VSI indicate that three underground storage tanks containing fuel oil for the boilers and engines are located in Building 9-C. Two of these tanks have a capacity of 25,000 gallons; the third has a capacity of 10,000 gallons (IT, 1990b). PRC did not locate the accessways or fill pipes to these tanks during the VSI. PRC determined that these four buildings have a combined floor space of about 5,400 square feet on the first floor (see Table 1).

The second floors of Buildings 9-A and 9-C are connected to the second floor of Building 7 and appeared to have been used for the same operations that occurred in that building (see Section 2.2.3.3).

PRC did not observe Buildings 13-A and 13-B during the VSI, because these buildings were burned in a 1990 fire (see photographs 81, 86, 97, and 105). Both buildings were two-story structures before the fire (Armstrong Paint, date unknown). Fire damage was extensive, and PRC did not enter these buildings for safety reasons. Goodwill and Valspar both indicated during the VSI that this portion of the facility was used as office space. According to the maps obtained after the VSI, these buildings contained storage and office rooms (Armstrong Paint, date unknown). PRC determined that Buildings 13-A and 13-B had a combined floor space of approximately 5,200 square feet (see Table 1).

Building 15 is a one-story building located in the south central portion of the facility east of a railroad spur cutting through the facility (see photographs 16, 17, and 18). The building is entered by climbing a staircase about 5 feet high. The building consists of three bays. During the VSI, Valspar stated that they were probably originally used to cook varnish. The floor of the building was littered with debris, including several inches of dust and various metal scraps. Paint was peeling off the walls and ceiling, and a dark substance was spattered on the east wall of the building. Piping insulation was observed on the floor and hanging from pipes on the ceiling. PRC observed three tanks in this building, but information provided to PRC after the VSI does not indicate the presence of any tanks (IT, 1990b). One of the tanks PRC observed was partially filled with standing liquid. The ceiling in this building appeared to be about 20 feet above the floor. PRC determined that this building has a floor space of about 900 square feet (see Table 1). An east-west tunnel is located beneath the southern end of Building 15. Entrance to the tunnel is gained by climbing down a staircase about 3 feet. The tunnel runs along the length of the building, and it is about 3 to 4 feet wide, 6 feet high, and 30 to 40 feet long. PRC observed deteriorated piping insulation in the tunnel, and damp areas and debris were observed on the floor.

Building 25 is a one-story building located near the southeastern corner of the facility (see photographs 6 and 7). The building was not present at the facility when Armstrong Paint prepared engineering drawings of the facility between the 1940s and the 1960s (Armstrong Paint, date unknown). However, a 1971 survey of the facility includes this building (Silander & Son, 1971). This room is empty except for several storage racks and wooden pallets supported by metal legs. At least one of the storage racks contained an oily material tentatively identified by Valspar during the VSI as linseed oil. The floor contained debris, including chipped paint and oily stains. Based on the layout of the room, Valspar stated during the VSI that it believed the room was a drum storage area. PRC could not determine the contents of any drums that may have been stored in this building. PRC determined that this building has a floor space of about 820 square feet (see Table 1). PRC observed two, heavily deteriorated, paperboard drums on the south end of Building 25. These drums were leaking a semisolid, milky white substance onto the concrete pad, but the material was so viscous that its skin seemed to be containing any liquid material.

PRC observed a spill area east of Building 25 (see photograph 5). This area consists of a concrete pad heavily stained with a black substance that may be paint. The spills, which cover an estimated area of at least 75 square feet, appear to have run from their sources into a drain that is located near the middle of the concrete pad. PRC could not determine the location of this drain's outfall.

According to a facility survey performed in 1971, the area south of Building 15-B contained a transformer (Silander & Son, 1971). PRC observed a fenced-in area near this location, and it appears that some sort of equipment is indeed located here, but PRC did not enter the fenced-in area to investigate.

Two railroad spurs pass through the facility. Goodwill stated during the VSI that these spurs may have been used to unload raw materials or to load product. PRC walked along most of the lengths of both spurs and observed various debris scattered along both lengths of railroad track. One engine similar to the engines observed in Buildings 8 and 9-B was observed along the spur east of Building 9. Other areas along the spurs contained white powders, steel scraps, and stressed vegetation. PRC observed one pipe leaking onto the ground near the railroad spur east of Building 3-B (see photographs 13, 15, and 106).

PRC observed piping raceways throughout the facility. Some of the raceways were underground and were observed through accessways along the railroad spurs (see photograph 12). Other raceways ran along ceilings and walls throughout the facility. Some raceways contained pipes that were leaking materials onto the floors of the buildings. Others contained pipes that have been cut open and probably drained. These pipes were not leaking materials.

2.3 FACILITY OPERATIONS

This subsection discusses facility operations. Because the use of the facility over its entire history is unknown, this section is divided into three separate discussions. The first covers operations at the facility prior to 1976. The second covers operations during the time that Valspar produced paint at the facility between 1976 and 1984. The third covers the current status of the facility.

2.3.1 Prior to 1976

Before 1976, facility operations are unknown. Results of a title search performed by PRC for EPA indicate that between 1914 and 1935, all or part of the property was used by W.A. Jones Foundry and Machine Company. In 1935, Armstrong Paint acquired four parcels of land making up 18.1 acres of property west of South Kilbourn Avenue. In 1952, Armstrong Paint acquired the fifth parcel of land east of South Kilbourn Avenue. The fifth parcel was apparently used as a parking lot. On July 23, 1969, Armstrong Chemcon, Inc. (Chemcon), received ownership of the property. PRC could not determine if Chemcon is associated in any way with Armstrong Paint. Six months after Chemcon received ownership, the Anaheim Union Water Company received ownership of the five parcels of land. Six months later, in July 1971, the property was acquired by Joanne M. Jennings, who placed the property into American National Trust Number 75860. Goodwill received ownership of the facility in October 1984 from American National and Valspar. Goodwill placed the facility into American National Trust Number 48495 (PRC, 1991). American National currently owns the property, not personally, but as a trustee. A land holding company designated by Goodwill is the beneficiary of the trust.

Valspar operated at the facility during the time the property belonged to American National Trust Number 75860. A beneficiary of the trust, Howard Conant (Conant) leased the property to Valspar between 1976 and 1984.

Based on knowledge of the previous owners of the facility, PRC assumes that between 1935 and 1970, the facility was used for processes similar to Valspar's. Prior to 1935, the facility was probably used as a small foundry and metal machining shop. During the PA, several sources alleged that a lead smelting works was once operated on the facility property. PRC could not confirm this during the PA/VSI, but these allegations are explored further in subsection 4.8 of this PA/VSI report.

Building 7-C is referred to as the Cooper's Pit in numerous documents reviewed during the PA, and Building 7-B is referred to as the Cooper's Shop in a map obtained after the VSI (Armstrong Paint, date unknown). A cooper is a barrel-maker. Because the word "Cooper" is associated with both of these areas, PRC believes that companies formerly located at this facility may have placed their products into barrels made in these buildings.

2.3.2 Between 1976 and 1984

Valspar began producing coating products at the facility sometime in 1976. Valspar leased the property from Conant, a director of Valspar. Conant was the beneficiary of Trust

Number 75860 held by American National. Valspar manufactured various latex and solvent paints, varnishes, and roofing compounds at the facility.

No one who actually worked at this facility was available during the PA/VSI, and Valspar refused to answer questions regarding past operations at the facility during the VSI (Valspar, 1991). Therefore, PRC assumes that Valspar's operations at the facility are similar to operations at other paint plants that PRC has inspected. Paint is generally produced by mixing resins, solvents, and pigments together in varying proportions. The mixing takes place in large, paint processing tanks, similar to those observed at the facility. The paint may undergo its entire batching process on one floor of the facility, or it may be piped from upper floors to lower floors. Different materials may be added to the paint batch on each floor. The paint may undergo milling, which disperses the pigments into the solvent-resin blend by physical processes. Tinting compounds and other additives may be mixed into the paint batch to meet batch specifications.

Raw materials in paint-making generally include solvents, resins and oils, and pigments. During the 1980s, Valspar used solvent blends and resins containing hexylene glycol, ethanol, mineral spirits, petroleum distillates, acrylic polymers, ammonia, formaldehyde, vinyl acetate, acetaldehyde, nonylphenoxyl poly(ethyleneoxy)-ethanol, xylene, toluene, and 2-butanone. Valspar used pigments containing toxic metals, including lead, chromium, and cadmium (IT, 1990b).

Typically, paint production may generate caustic waste (D002) from cleaning paint-mixing tanks. It may also generate solvent waste (D001 and F-listed wastes), waste oils, and waste pigments, which exhibit the characteristic of toxicity for heavy metals. When Valspar operated at the facility, it generated D001, D002, D008, and F003 wastes (Valspar, 1980b).

2.3.3 Current Disposition

Valspar and American National, acting as trustee under Trust Agreement 75860, dated June 30, 1971, donated the facility to Goodwill in 1984. Under a Memorandum Agreement dated October 31, 1984, American National and Valspar arranged closure details for the facility and stated in the Memorandum Agreement that "the premises are subject to a Permit issued by [EPA] Identification No. ILD 081040107" (American National, 1984). Goodwill did not use the facility for any purpose other than storage of paper bales. Shortly after Goodwill received the donation, it discovered that a number of tanks and containers storing allegedly hazardous materials were left at the facility. Goodwill filed a lawsuit against Valspar, Conant, IEPA, and EPA in June 1989, when it became apparent to Goodwill that the tanks and containers were not formally closed under RCRA. In its Notice of Intent to File Citizens' Suit Under RCRA Section 7002(a)(1) in June 1989, Goodwill stated that "Valspar's violations have created an uncontrolled hazardous waste facility" (Bell, Boyd & Lloyd, 1989). The facility remains in litigation.

The facility has been reported to the National Response Center (NRC) by RERC Environmental (RERC), a consultant for Goodwill. The incident report on file at NRC indicates that RERC reported spilled substances with a total of 1 gallon of unknown oil and 1 gallon of unknown material with a xylene base. According to the incident report, the materials were discovered leaking out of a pipeline at the facility and had discharged to the soil. NRC filed the report, and no further actions were taken (U.S. Coast Guard, 1990).

During the VSI, Goodwill stated that Kilbourn Properties, a small electrical motor company, used part of the property. PRC could not locate or identify buildings or office spaces owned or used by Kilbourn Properties. Kilbourn Properties stores equipment and uses office space at this location (Kilbourn Properties, 1991).

The property to the south of the facility is currently owned and operated by Armstrong Containers. PRC did not identify any legal or business connection between Armstrong Containers and Armstrong Paint, which owned and operated the property before Armstrong Containers assumed ownership. A vice-president of Armstrong Containers stated that he is unaware of any connection between the two entities (Armstrong Containers, 1991). Armstrong Containers currently manufactures paint cans and is on file with EPA as a generator of hazardous waste, including D001 and D003 wastes (Armstrong Containers, 1980). Armstrong Containers obtained EPA identification number ILD 005 067 988 when it filed its Notification of Hazardous Waste Activity Form. Armstrong Containers has also been identified as a CERCLIS facility (RERC, 1990). PRC did not locate files related to Armstrong Containers in EPA's emergency response files.

Goodwill stated during the VSI that the abandoned buildings at the facility are currently used by vagrants and transients. During the VSI, PRC observed evidence that persons other than Goodwill, Valspar, and other authorized individuals had entered the facility.

2.4 REGULATORY HISTORY

Because of the complex history of this facility, the discussion of regulatory history is organized into two subsections. The first discusses the facility's regulatory history between 1980 and 1984, after RCRA regulations went into effect and before Valspar left the facility. The second discusses the facility's regulatory history after it was donated to Goodwill.

2.4.1 Between August 1980 and October 1984

EPA received a Notification of Hazardous Waste Activity Form from Valspar on August 13, 1980 (Valspar, 1980a). Valspar modified its notification in a subsequent filing of the same form, which EPA received on November 18, 1980 (Valspar, 1980b). Valspar notified as a generator and as a treatment, storage, and disposal facility (TSDF).

Valspar filed a RCRA Part A permit application in November 1980. The permit application allowed for storage of 10,000 gallons of hazardous waste in containers and 4,000 gallons of hazardous waste in tanks. In attachments to the RCRA Part A permit application, Valspar indicated that two container storage areas would be used to store drummed wastes. Valspar did not indicate the number or locations of its hazardous waste tanks. Hazardous wastes listed in the permit application are D001, D002, D008, and F003 (Valspar, 1980c). The permit application was approved by EPA in March 1982 (EPA, 1982).

PRC located no historical records that indicated that Valspar discharged to any bodies of water under a National Pollutant Discharge Elimination System (NPDES) permit. PRC also did not locate records indicating that Valspar held any air permits.

According to the Chicago Metropolitan Water Reclamation District, Valspar never applied for a permit to discharge its wastewaters to the City of Chicago (Chicago Metropolitan Water Reclamation District, 1991).

2.4.2 After October 1984

Since the facility was donated to Goodwill in October 1984, EPA and IEPA have performed various activities there, including closure activities, enforcement actions, interim status standards (ISS) inspections, and CERCLA activities.

2.4.2.1 Initial Closure Activities

According to documents located during the PA, Valspar filed a closure plan with EPA in early November 1984. Because IEPA had interim authority for implementing the RCRA program, the closure plan was forwarded to IEPA (EPA, 1984a; 1984b). This closure plan indicates that one 4,000-gallon storage tank and one container storage area with an inventory of 181 drums were to be closed. One paragraph of the closure plan addresses closure of areas other than the tank and drum storage units. This paragraph is quoted below.

> Any facility equipment or structures that have residues of Valspar's hazardous wastes are not expected to be hazardous waste. Any ignitable waste spills will be cleaned up in accordance with the spill plan. The residues remaining would not be hazardous because the flammable solvents would have evaporated leaving a thin solid coating which is no longer ignitible (sic); therefore, decontamination of equipment will not be necessary. Any caustic waste residue will be neutralized and removed leaving no caustic residues. Any lead containing liquids will also be cleaned and removed. The remaining residue would be a dry paint film which is not hazardous (Valspar, 1985).

Valspar's closure plan was approved in February 1985. Valspar submitted the required certifications of closure by its consultant, M. Rapps Associates (Rapps), in March 1985 (IEPA, 1985b; Rapps, 1985).

Valspar agreed to an IEPA closure inspection in April 1985. During the inspection, IEPA observed that the regulated tank and container storage areas identified by Valspar during the closure inspection were closed in accordance with the closure plan. However, Goodwill representatives present during the closure inspection stated that several tanks contained unknown materials. Upon examination, IEPA determined that a number of tanks and containers of roofing compound, solvents, and other unknown materials remained at the facility. Valspar representatives asserted that because Valspar had only leased the facility and because it had transferred the property to Goodwill, it was not responsible for any cleanup action at the facility. IEPA determined that this was not the case. The inspection report filed in the IEPA Enforcement Division File concluded that because Valspar left hazardous materials on site with no intention of using them for their intended purposes, the materials became waste 90 days after Valspar left the facility. Valspar was held in apparent violation of a number of regulations and requirements set forth by RCRA and the Illinois Administrative Code (IAC) (IEPA, 1985b).

During telephone conversations with EPA, IEPA stated that major violations had been noted during the closure inspection. IEPA also stated that hundreds of drums were found (EPA, 1985).

2.4.2.2 Enforcement Actions and Further Closure Activities

After the April 1985 closure inspection, IEPA inventoried the facility on June 14, July 1, and July 2, 1985. On July 2, 1985, IEPA sampled a number of drums, tanks, and pipelines. A total of 28 samples were collected; 12 of these samples were found to have flashpoints less than 80°F and were accordingly designated as Class I flammable materials. Additionally, IEPA discovered three rooms "filled to capacity with paper bails [sic] . . . during the inspections, adding to the potential fire and explosion hazard." IEPA issued a Record of Decision (ROD) under Illinois state authority on July 15, 1985. The ROD required immediate removal action at the facility (IEPA, 1985c).

On July 16, 1985, IEPA issued to Valspar, Goodwill, and American National a "Notice to Parties Liable for a Release or a Substantial Threat of a Release of a Hazardous Substance" [4(q) Notice]. The 4(q) Notice informed the addressees that IEPA was "considering [spending] public funds to investigate and take corrective action for the control of releases and threatened releases at the [facility]" (IEPA, 1985d). On July 25, 1985, Goodwill and Valspar met with IEPA to discuss the 4(q) Notice. During the meeting, Goodwill and Valspar agreed to (1) provide 24-hour security at the facility, (2) remove all baled paper immediately, (3) inventory all materials at the facility to determine the extent of hazardous substances, and (4) develop a facility safety plan (IEPA, 1985e).

Valspar hired a private consultant, Kinsey Consulting, Inc. (Kinsey, also known as Waste Reduction), to respond to the 4(q) Notice. Kinsey inventoried 328 tanks it found at the facility in August and September 1985. Of the 328 tanks, Kinsey determined that approximately 12,360 gallons of hazardous residues in 77 tanks required removal. Much of the residues identified were considered hazardous because of their ignitability. Kinsey produced a "Phase I Identified Response Action" (Identified Response) report that identified each of the inventoried tanks (Waste Reduction, 1985). This report is included as Attachment D to this report and includes sketches of some of the buildings.

IEPA determined that the Identified Response would suffice as a response to the 4(q) Notice with several modifications. The required modifications were outlined in a letter from IEPA to American National in May 1986 (IEPA, 1986b). The modifications were subsequently adopted by Valspar.

Kinsey prepared a letter report to IEPA in July 1987 (Kinsey Report). The Kinsey Report indicated that remedial activities as defined in the Identified Response had been completed. According to the Kinsey Report, five tasks were completed during the cleanup. The five tasks, as stated in the report, are listed below.

1. Remove dust and peeled paint on floors in Buildings 7, 8, and 12.
2. Clean 58 aboveground tanks.
3. Clean 23 underground tanks and pressure test to determine if they leak.
4. Clear all production and tank related pipes.
5. Remove unused asbestos insulation in storage shed (Kinsey, 1987).

IEPA supervised the remedial activities outlined in the Kinsey Report. The Kinsey Report in its entirety is provided as Attachment E to this PA/VSI report.

In September 1987, IEPA responded to the Kinsey Report in a letter to American National, Goodwill, and Valspar. This letter pointed out that PIDs continued to detect organic vapors in the cleaned underground tanks and that this issue must be addressed (IEPA, 1987a). As a result of this letter, all three parties agreed to meet with IEPA in order to discuss potential soil and ground-water contamination from the underground tanks. During the subsequent meeting, IEPA requested that the parties document any soil contamination beneath any tanks containing elevated levels of organic vapors or clean the tanks again. IEPA also questioned the fact that two of the cleaned tanks still contained liquids after they had been cleaned. IEPA suggested that ground water might have leaked into the tanks after they were cleaned (IEPA, 1987b).

Valspar addressed the underground tank issue in a Work Plan submitted to IEPA. This Work Plan was not found in the IEPA enforcement files during the PA. IEPA approved the Work Plan with two modifications in September 1988 (IEPA, 1988b).

In March 1989, IEPA informed Valspar that it recommended cleanup objectives for methylene chloride, xylene, and phenanthrene in soils. IEPA also required Valspar to perform further soil sampling for lead and Extraction Procedure (EP) Toxic lead. IEPA noted that any levels of EP Toxic lead greater than 100 micrograms per liter (μg/L) may require revisions of the cleanup strategy (IEPA, 1989a). Valspar indicated that EP Toxic concentrations of lead in the Cooper's Pit soils did not exceed 100 μg/L (Fredrikson & Byron, 1989) Valspar's sample analyses results indicated total lead concentrations as high as 256 parts per million (ppm) and EP Toxic levels as high as 0.11 milligrams per liter (mg/L). The 0.11 mg/L EP Toxic lead level exceeds IEPA's cleanup objective for EP Toxic lead, but when corrected for soil moisture, Valspar's consultant, Roy F. Weston, Inc. (Weston), claimed that the EP Toxic lead level is 0.10 mg/L. A summary of the Cooper's Pit soil analyses are provided in Table 2. In its April 1989 letter to Valspar, Weston included a Work Plan and a Health and Safety Plan for bioremediation of organic contaminants in the Cooper's Pit soils (Weston, 1989). PRC did not locate any sample results

TABLE 2

SUMMARY OF COOPER'S PIT LEAD ANALYTICAL RESULTS

	12-28-88 (IEPA) Total Lead (mg/kg)		3-23-89 (Valspar) Total Lead (mg/kg)		EP Toxic Lead (mg/L)		Total Solids	
Sample Number	Dry Basis (Result)	Wet Basis (Corrected)	Wet Basis (Result)	(Corrected)[a]	Result	(Corrected)[a]	IEPA	Valspar
1	29.1	25.2	59.8	55.7	<0.05	<0.05	86.6	93.0
2	256	215	180	168	0.11	0.10	83.9	90.0
3	10.1	8.4	<5.6	<5.3	<0.05	<0.05	83.5	89.0
4	2.1	1.7	<5.4	<4.8	<0.05	<0.05	79.6	89.0
5	6.3	5.1	<5.6	<5.1	<0.05	<0.05	80.7	88.0
6	104	88.7	NA[b]	NA	NA	NA	NA	NA

Notes:

a The samples have lost moisture from 28 December 1988 to 23 March 1989. the average change in moisture from one date to the next was from 82.86% total solids. These results are reported on the basis of the original moisture content.

b Not enough sample to analyze.

Source: Quoted from Weston, 1989

before April 1989 that indicate the presence of organic contaminants in the Cooper's Pit. Apparently, IEPA did not approve or disapprove this Work Plan (IT, 1990b).

Valspar and its consultant, IT, prepared a Closure Plan for the facility in May 1990. The Closure Plan identified 42 tanks containing materials deemed hazardous by characteristic or listing. Valspar proposed to close these 42 tanks, their associated pipelines, and the nearby structures. The Closure Plan also addressed cleanup of soil contamination in the Cooper's Pit, the North Tank Farm, and the South Tank Farm. As stated in the Closure Plan, the proposed cleanup levels were as follows:

- Toluene 20,000 mg/kg in soil
- Benzene 24 mg/kg in soil
- Xylene 200,000 mg/kg in soil (IT, 1990a).

IEPA determined that "The cleanup objectives proposed by Valspar . . . are not acceptable." IEPA also determined the existence of numerous other deficiencies of the Closure Plan and disapproved it in August 1990 (IEPA, 1990b).

In October 1990, Valspar and IT prepared a report entitled "Settlement Proposal Phase I Report: Response to Deficiencies, Closure and Sampling Plan for 1330 Kilbourne (sic) Avenue, Chicago, Illinois 60623" (Settlement Proposal). In the Settlement Proposal, Valspar proposed to formally close 21 tanks at the facility. The Settlement Proposal notes that of the original 42 tanks requiring closure in the Closure Plan, some contained materials that were shipped to other Valspar plants and thus were not subject to regulation as hazardous waste under RCRA. Therefore, Valspar contends that only 21 tanks require closure. However, in a table summarizing the tanks requiring closure, 22 tanks are indicated (IT, 1990b). Because the description of the tanks requiring closure in the body of the Settlement Proposal is not detailed, PRC cannot identify why this discrepancy exists. The Settlement Proposal is included as Attachment F to this PA/VSI report.

In the Settlement Proposal, Valspar also outlines a soil and soil gas survey that will be performed at the facility in order to address IEPA's concerns about soil and possible ground-water contamination (IT, 1990b).

IEPA approved the Settlement Proposal subject to a number of conditions and modifications in January 1991. One of these conditions was that "closure activities must be completed by August 1, 1991" (IEPA, 1991). PRC observed no evidence that closure activities as indicated in the Settlement Proposal had occurred during its VSI in late July 1991.

2.4.2.3 Interim Status Standards Inspections

During the closure and enforcement activities being performed at the facility, IEPA continued to perform ISS inspections. The fact that IEPA continued to perform these inspections may indicate that IEPA was treating the facility as a RCRA-regulated facility.

IEPA visited the facility in order to perform a RCRA ISS inspection in January 1985. Finding no one at the facility, IEPA telephoned Valspar's Minneapolis corporate headquarters. Valspar informed IEPA that the facility was physically closed and that all waste had been removed from the facility. IEPA determined that even though no waste was present at the facility, Valspar was in apparent violation of several closure- and inspection-related Illinois Administrative Code (IAC) regulations (IEPA, 1985a).

IEPA performed an ISS inspection of the facility in April 1986. The inspection report noted that major violations of RCRA and IAC existed at the facility, including violations of regulations pertaining to training records, waste analysis plans, contingency plans, operating records, and closure plans. The inspection also revealed that ". . . containers are not being inspected as required . . . and tanks containing hazardous waste are not being inspected as required . . ." The IEPA inspector noted that vandalism had occurred in areas containing hazardous wastes. The IEPA inspector also noted that valve heads on a number of tanks had been removed, presumably for resale as scrap metal. This activity had resulted in materials flowing from pipes onto the facility floors (IEPA, 1986a).

IEPA performed an ISS inspection of the facility in July 1988. The inspection report noted that conditions at the facility were generally the same as those during the April 1986 ISS inspection. The inspector noted that voluntary cleanup of the facility was being performed by Valspar and being monitored by IEPA. The discovery of several underground storage tanks led to negotiations for removal of these tanks. The inspector also noted that vandalism was continuing at the facility. In the inspection report, IEPA determined that "this facility is not subject to RCRA as closure has been performed" (IEPA, 1988a). This inspection report is the only inspection report that states that the facility may no longer be subject to RCRA, and IEPA apparently did not consider this to be the case because it continued to perform ISS inspections at the facility.

IEPA performed an ISS inspection of the facility in June 1989. The inspection report noted that according to consultants all hazardous waste on site had been removed by July 1987, and the facility did not store any hazardous waste (Kinsey, 1987). The inspector noted that many tanks had been cut open and emptied and that "there was some visual indication that some of the concrete floors may be contaminated." The inspector also noted that approximately 80 tanks appeared to require RCRA closure. The inspection report concluded that Valspar was in violation of five regulations pertaining to closure and the maintenance of an operating record (IEPA, 1989b).

The June 1989 ISS inspection resulted in an Enforcement Notice Letter to Conant and Valspar. In the letter, IEPA detailed the RCRA and IAC violations noted during the inspection and stated that the matter was being referred to the Illinois Attorney General's Office (IAG) for the filing of a formal complaint (IEPA, 1989c). IAG is currently preparing an Interim Order on Consent with Goodwill and Valspar (IAG, 1991)

IEPA performed an ISS inspection of the facility in July 1990. The inspection report noted that few changes in the condition of the facility had occurred since the June 1989 inspection. The inspector noted that the perimeter fence seemed intact. Several violations were detailed, including violations of regulations pertaining to closure plan and operating record maintenance (IEPA, 1990a).

2.4.2.4 CERCLA Actions

The facility has also been the subject of limited CERCLA response actions. EPA tasked the Weston Technical Assistance Team (TAT) to conduct a Site Assessment (SA) of the facility in September 1990. (Weston previously consulted for Valspar.) TAT stated in the SA report that prior to sampling, it had identified the following areas of concern where hazardous materials may be stored or may have been released:

- Building 3, where electrical generators have been dismantled and polychlorinated biphenyls (PCBs) may be present;
- The resin storage areas, specifically, the south and north halves of Building 6;
- The production area, specifically Building 7 (Coopers Pit); and
- The basement of Building 9 (Weston, 1990).

TAT samples were analyzed for F-listed solvents, EP Toxic metals, and PCBs. A summary of the TAT sample analyses results is provided in Table 3. One metals sample collected in Building 10 was not above EP Toxic levels. No other metals samples were collected. Four samples collected for F-listed solvent analyses indicated that various levels of 2-butanone, toluene, ethlybenzene, benzene, and xylene were present at the facility in a resin sample from Building 6, a tar sample from Building 10, and a soil sample from Building 10. Eight sludge, liquid, and wipe samples analyzed for PCBs indicated that Aroclors 1248, 1254, and 1260 are present in these matrices. TAT concluded that the facility may pose an immediate threat to human health and the environment and may warrant a removal action (Weston, 1990).

2.5 FACILITY CHARACTERIZATION ACTIVITIES

In addition to IEPA and EPA, Goodwill and the Chicago Fire Department (CFD) have investigated the facility.

2.5.1 Goodwill

Goodwill has initiated limited sampling efforts at the facility through its contractor, RERC. Goodwill's sampling efforts were undertaken to characterize the facility and are not related to any enforcement actions requested by IEPA. A January 1990 RERC environmental assessment report documents a number of contaminants at the facility. RERC identified several areas of potential environmental concern, including (1) possible PCB contamination, (2) the presence of underground storage tanks, (3) contaminated process vessels and piping, (4) resin- and oil-stained and coated floors, (5) peeling paint, and (6) the presence of asbestos (RERC, 1990a).

RERC collected a number of environmental samples during its facility visit in December 1989. RERC's findings are summarized in Table 4. Wipe samples were taken from various wall and floor surfaces at the facility and analyzed for PCBs. Each wipe sample was collected over an area of 100 square centimeters (cm^2). PCB sampling revealed total PCBs at levels up to of 4,413,000 micrograms per 100 cm^2 ($\mu g/100\ cm^2$). RERC stated that because the surfaces that were sampled are considered to be low contact surfaces, "Based on U.S. EPA's spill cleanup policy, the cleanup level for these areas is 10 $\mu g/100\ cm^2$" (RERC, 1990a). Based on the levels of PCBs found on site, RERC believes that PCB-containing transformers were likely to have been present on the property. According to RERC, oils containing 600,000 to 700,000 ppm PCBs were typically contained in such transformers (RERC, 1990b).

TABLE 3

SUMMARY OF TAT SAMPLING ANALYTICAL RESULTS[a]
(parts per million)[b]

Sample Number	Building	Matrix	2-Butanone	Toluene	Ethylbenzene	Benzene	Xylene
S-47	7-C	Liquid	BDL[c]	BDL	BDL	BDL	BDL
S-52	6	Resin	31.4	5.05	60.06	BDL	165.0
S-55	10	Tar	BDL	1.47	20.1	0.77	63.5
S-56	10	Soil	BDL	0.474	3.18	BDL	11.5

Sample Number	Building	Matrix	Aroclor 1248	Aroclor 1254	Aroclor 1260
S-45	3-B	Wipe[d]	BDL	BDL	103,000
S-46	3-B	Sludge	2,770	BDL	448,000
S-48	7-C	Wipe[d]	BDL	19.6	BDL
S-49	8	Sludge	BDL	7.33	BDL
S-50	9	Sludge	BDL	2.49	BDL
S-51	9	Sludge	BDL	6.67	BDL
S-53	12	Wipe[d]	BDL	BDL	61,800
S-54	12	Liquid	BDL	BDL	3,300

Notes:

[a] Samples analyzed by Grace Analytical Laboratories, Inc., in Berkeley, Illinois, under TAT Analytical Services TDD# 5-9009-L01

[b] Results are reported in parts per million (ppm) unless otherwise noted

[c] Below Detection Limit

[d] Reported in micrograms per 100 square centimeters ($\mu g/100\ cm^2$)

Source: Quoted from Weston, 1990.

TABLE 4
SUMMARY OF RERC SAMPLING ANALYTICAL RESULTS

Sample Location	Matrix	Parameter	Results	Units
Building 3 - Electrical Room	Wipe	PCBs	4,413,000	$\mu g/100\ cm^2$
Building 3 - Electrical Room	Wipe	PCBs	1,506,996	$\mu g/100\ cm^2$
Building 9 - Basement Floor	Wipe	PCBs	12,917	$\mu g/100\ cm^2$
Building 14 - Electrical Vault	Wipe	PCBs	161,464	$\mu g/100\ cm^2$
Southwest Tank Farm	Soil	Total Lead	180	ppm
		EP Toxic Lead	0.8	mg/L
Building 7C - Floor	Soil	Total Lead	230	ppm
		EP Toxic Lead	0.8	mg/L
Building 7C - Pits	Soil	Total Lead	200	ppm
		EP Toxic Lead	0.3	mg/L
Railroad Spur	Soil	Total Lead	690	ppm
		EP Toxic Lead	0.4	mg/L
Building 7C - Outside	Resin	Acetone	730	ppm
		Toluene	20	ppm
		Ethylbenzene	190	ppm
		Xylenes	21,000	ppm
		2-Hexanone	17	ppm
		2-Butanone	98	ppm
Main Building[a]	Peeling paint	Total Lead	230	ppm
		EP Toxic Lead	0.3	mg/L

Note:

[a] Sample location not noted in source document

Source: RERC, 1990a.

Soil samples were also analyzed for lead. Lead levels as high as 690 ppm were found in facility soils. EP Toxic levels of lead were found to be as high as 0.8 mg/L in facility soils. Peeling paint was sampled and found to contain a total lead content of 230 ppm. EP Toxic levels of lead were found to be 0.3 mg/L (RERC, 1990a). RERC's findings are summarized in Table 4. RERC noted that "cleanup levels for lead under Superfund and the Illinois State Remedial Action Priority List (SRAPL) program are determined on a facility by facility basis." RERC also noted that "Cleanup levels for lead at Superfund sites have included background levels (roughly 30 ppm lead), risk assessment levels (approximately 200 ppm), and old Centers for Disease Control risk levels (500 ppm)" (RERC, 1990a).

A resin sample collected outside the Cooper's Pit (Building 7-C) was analyzed for volatile organic compounds (VOC). It contained detectable levels of acetone (730 ppm), toluene (20 ppm), ethylbenzene (190 ppm), xylenes (21,000 ppm), 2-hexanone (17 ppm), and 2-butanone (98 ppm) (RERC, 1990a). RERC did not provide the exact location from which this sample was collected, but the only resin that PRC observed outside the Cooper's Pit was located on the west side of the building. RERC's findings are summarized in Table 4.

In June 1990, RERC performed a walk-through and visual inspection of the facility in order to ascertain how much asbestos might be present. During the walk-through, RERC noted liquids seeping out of pipes and onto the ground. RERC called NRC and reported these releases under NRC Case Number 26531 (RERC, 1990c).

RERC collected samples of piping insulation suspected to contain asbestos on July 19, 1990. Samples of piping insulation were taken from fallen pipes near the main entryway to Building 7 and outside of Building 3-B. Samples were analyzed by Testwell Craig Laboratories, Inc., in Chicago, Illinois, and were found to contain between 40 and 50 percent amosite and chrysotile asbestos fibers (RERC, 1990d).

2.5.2 City of Chicago

CFD responded to a fire at the facility on August 19, 1990. The CFD Office of Fire Investigation (OFI) was dispatched to the facility shortly after the fire was reported. The initial incident report of the fire filed by OFI classified the cause of the fire as unknown or suspicious (CFD OFI, 1990a). The fire destroyed large portions of Buildings 13-A, 13-B, and 14, and it caused smoke damage in several other buildings.

CFD OFI followed up the initial report with a fire investigation. The investigation concluded that the fire was intentionally set by unknown persons. The investigation also included an inspection of the entire facility. The progress report written after this inspection stated:

> Starting in the basement, quite a number of open floor pits and sewers were observed, some of these pits and sewers were approximately 10' to 20' deep and constitute a real hazardous condition to anyone walking through the basement; especially firefighters. Some of these openings were 24" in diameter.
>
> Also discovered in the basement were liquid storage tanks approximately 15' long by 6' in diameter, some of these tanks had paint related chemicals in them, the exact quantity is not known (CFD OFI, 1990b).

Based on these reports from CFD OFI, the City of Chicago became concerned that the facility might pose a threat to nearby residents. One City of Chicago lawyer accompanied PRC during the early part of the VSI, and the city is currently considering taking further actions (Chicago Attorney General's Office, 1991).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Chicago is greatly influenced by Lake Michigan. Winters are cold and snowy, and summers are warm. The average daily high temperature in July is 72.2°F; the average daily low temperature in January is 21.1°F. The average annual temperature is 49.0°F [U.S. Department of Agriculture (USDA), 1979].

The yearly mean precipitation in Chicago is 33.42 inches. Average snowfall is 38.3 inches, occurring between October and May (USDA, 1979). Annual mean lake evaporation in the vicinity of Chicago is approximately 29.75 inches [U.S. Department of Commerce (U.S. DOC), 1968]. The 1-year, 24-hour rainfall in Chicago is approximately 2.4 inches (U.S. DOC, 1961). Winds are typically from the north-northeast in winter and from the south in summer. Average wind speeds range from 8.1 to 12.1 miles per hour (U.S. DOC, 1980).

2.6.2 Flood Plain and Surface Water

The facility is located about 2-3/4 miles north of the Chicago Sanitary and Ship Canal and less than 4-1/2 miles east of the Des Plaines River. It is located more than 6 miles west of Lake Michigan (USGS, 1972; 1980a; 1980b). Drainage from the facility probably enters the storm sewers servicing the neighborhood. These storm sewers discharge to the Chicago Sanitary and Ship Canal (Chicago Department of Sewers, no date).

The Chicago Sanitary and Ship Canal is used for industrial purposes. The Des Plaines River is used for recreational purposes. Lake Michigan is used for recreational purposes and as a drinking water supply for the City of Chicago and neighboring communities. The facility is not located in the flood plains of any of these bodies of surface water (Federal Emergency Management Agency, 1981).

2.6.3 Geology and Soils

The facility is located in an area that was probably originally composed of soils of the Milford Series. Milford soils are deep, poorly drained, and fairly level. They were formed on lake plains or along drainageways on uplands (USGS, 1979). During the VSI, it was evident that a large portion, if not all, of the facility was built on fill material. The facility and its neighboring properties were mostly covered with concrete or asphalt surfaces, buildings, or fill. The depth and source of the fill material at the facility is unknown.

No site-specific geological data exists, and the information within this subsection has been summarized from regional data. The regional geology has been documented by the Illinois State Geological Survey (ISGS). Well records from a well drilled about 1-1/4 mile west of the facility indicate that approximately 55 feet of glacial drift underlie the region. The drift is underlain by approximately 320 feet of Silurian Age dolomites. Beneath the dolomites are four members of Ordovician Age: Maquoketa shale-dolomite, Galena-Platteville dolomite, Saint Peter sandstone, and Oneota dolomite. The Saint Peter sandstone is the only significant water bearing unit of Ordovician Age. It lies almost 900 feet below ground surface in the region. Below the Ordovician system is the Cambrian system. It consists of the following three units: the Trempealeau dolomite, Franconia sandstone and dolomite, and Ironton-Galesville sandstone. Of the Cambrian units, only the Ironton-Galesville sandstone produces significant quantities of water (ISGS, 1943a). The deeper Mount Simon sandstone formation is also used as a source of water. It is located at depths approximately 1,900 feet below ground surface in the region.

2.6.4 Ground Water

The unconsolidated glacial drift and the Silurian dolomite formations beneath the facility are hydraulically connected. However, the depth to ground water and ground-water flow direction are unknown. No users of the shallow drift or dolomite aquifers within 1 mile of the facility have been identified.

The deep sandstones (Saint Peter, Ironton-Galesville, and Mount Simon) are used by industries in the Chicago area. These aquifers are hydraulically separated from the shallow drift and dolomite aquifers by the Maquoketa Shale Formation. Due to local pumping effects, ground-water flow direction in these units beneath the facility is unknown. The water from these units is generally high in dissolved solids, chloride, sulphate, and hardness (ISGS, 1943b).

2.7 RECEPTORS

Land use within 1 mile of the facility is a mixture of residential, light industrial, and heavy industrial. Residences are located opposite the facility's southeast corner. During the VSI, PRC observed that unauthorized persons currently use the facility for shelter. During the VSI, Goodwill confirmed that the buildings on the property have been used by vagrants and transients since Valspar vacated the facility in 1984. Neither Valspar nor Goodwill currently provides 24-hour surveillance of the facility, although it is fenced on all sides. Based on evidence that trespassing has occurred, the fencing does not appear to prevent unauthorized persons from entering the facility.

Ground water is used for industrial purposes in the urbanized areas in and around Chicago. The nearest industrial wells identified during a file review at ISGS are located less than 3/4 mile from the facility (ISGS, 1936). Several other industrial wells were identified within a 2-mile radius of the facility. All of these wells tap the deep sandstone aquifers, primarily the Ironton-Galesville unit (ISGS, 1936, 1943a, 1943b). Ground-water direction in these units beneath the facility is unknown. The current dispositions of these wells are also unknown.

The nearest surface water body to the facility is the Chicago Sanitary and Ship Canal, located about 2-3/4 miles south of the facility. Drainage from the facility probably enters the storm sewers servicing the neighborhood and eventually discharges to this body of water (Chicago Department of Sewers, no date). The Chicago Sanitary and Ship Canal is used for industrial purposes. Small recreational lakes are located in parks around the facility. None of these lakes are located within 1 mile, and it is unlikely that any surface water runoff from the facility would enter these lakes.

Forest preserves are located along the Des Plaines River about 4 miles to the west. No other sensitive environments near the facility were identified during the file search (USGS, 1972; 1980a; 1980b).

3.0 SOLID WASTE MANAGEMENT UNITS

Valspar's RCRA Part A permit application filed with IEPA indicates that two "Storage Areas" were intended for the storage of hazardous waste. One storage area was located north of Building 3; the other storage area was located west of Building 3-F (Valspar, 1980c). During its file review, PRC did not locate any evidence that these two areas were closed by a licensed engineer.

PRC contacted Rapps, the engineering firm that performed closure of the facility. Daniel Flynn was the Rapps engineer that closed the facility. He could not remember with any certainty the areas that were closed, but he did remember closing one drum storage area and one waste storage tank. From a series of photographs taken in 1985 during closure activities, and from a description that Mr. Flynn provided over the telephone, PRC believes that the Mr. Flynn closed the concrete pad south of Buildings 1 and 2 and a storage tank at an unidentified location. PRC provided Mr. Flynn with a map of the facility and requested that he mark the areas of the facility that contained the drum and tank storage areas that underwent closure. Mr. Flynn did not mark the waste storage areas because he could not identify those areas. Mr. Flynn informed PRC that it should request that Valspar provide any maps of the areas that underwent closure (Rapps, 1985; 1991).

Valspar provided PRC with the copy of a RCRA Part A permit application included in the Settlement Proposal (IT, 1990b). Valspar's RCRA Part A permit application includes a facility map that identifies the container storage area at the location closed by Rapps. However, PRC did not locate this map during its file reviews at EPA and IEPA.

Based on the above information, PRC identified four hazardous waste storage units. Three drum storage areas were located outdoors at the facility; one was located north of Building 3; one was located west of Building 3-F; and one was located south of Buildings 1 and 2. One tank storage area consisting of one hazardous waste storage tank was located inside one of the facility buildings. Because of the overall condition of the facility, PRC could not specifically locate or identify these units. According to Valspar's Part A permit application, Valspar was permitted to store D001, D002, D008, and F003 wastes in these units (Valspar, 1980c).

Mr. Flynn indicated that there were no signs of release from the units that it did close (Rapps, 1985; 1991). However, Mr. Flynn did not view these areas until March 1985, approximately 5 months after Valspar vacated the facility. Mr. Flynn made no mention of closing the two drum storage areas identified in the original RCRA Part A permit application filed with IEPA (Rapps, 1991). Therefore, PRC believes that these two drum storage areas may have been used and not properly closed under RCRA.

4.0 AREAS OF CONCERN

During the VSI, PRC was not able to clearly locate any SWMUs. Therefore, a number of units that may have been SWMUs when the facility was active are addressed as AOCs. Additionally, hazardous materials stored on site may be considered abandoned and therefore hazardous waste. Storage units containing these materials may be considered SWMUs, but they are addressed as AOCs in this PA/VSI report because PRC could not determine the contents of the storage units. A number of other general AOCs were also identified during the VSI.

Each AOC is described as fully as possible. Because only limited, general information about past practices was provided during the VSI, PRC can only describe what the inspection team observed. Valspar and Goodwill representatives could not fully identify or describe several areas seen during the inspection. This section describes the AOCs noted during the VSI and attempts to correlate these AOCs with past sampling efforts where possible.

4.1 CONTAINERS

PRC observed at least 37 drums and other containers during the VSI. PRC used a photoionization detector (PID) to determine whether these containers held volatile constituents. The PID sensor was placed in open bungs or near the seam between the lid and container where possible. Based on readings taken with the PID, PRC believes that some of these containers may contain volatile and possibly hazardous constituents. Containers seen during the VSI ranged in size from 5-gallon pails to 55-gallon drums and contained liquid, solid, and semisolid materials. Most containers were not labelled. In the few cases that PRC could estimate the containers' contents from labels, PRC has indicated this in the narrative. PRC observed empty drums and containers in the shed south of Buildings 1 and 2; in Buildings 5, 5-C, 7-B, and 9-A; and on the sixth floor of Building 12. A summary of the containers observed at the facility during the VSI is provided in Table 5.

Most of the containers containing liquids appeared to be mostly full. Most of the containers containing solids were about half full. According to information provided to PRC after the VSI, all containers holding hazardous materials were removed from the facility during response actions initiated by the 4(q) Notice. Using a PID, PRC detected volatile organic vapors as high as 5,000 ppm in some containers. Neither Goodwill nor Valspar responded to questions about the contents or origination of the containers (Bell, Boyd & Lloyd, 1991b; Valspar, 1991).

TABLE 5

CONTAINERS OBSERVED DURING THE VSI[a]

Location	Floor	Liquid with Volatile Constituents[b]	Liquid without Volatile Constituents[b]	Solid with Volatile Constituents[b]	Solid without Volatile Constituents[b]	Contents Not Observed
Building 5-D	–	1	0	0	0	0
Building 6-A	1	0	0	0	2	0
Building 7	1	0	0	0	1[c]	0
Building 8	1	3	3	0	0	1
Building 8 (Generator Room)	1	2	4	0	0	0
Building 9	–	0	0	0	0	2
Building 10	1	1	0	0	0	0
Building 12	5	0	0	0	2	0
Building 13	Basement	0	0	0	0	1
Building 14-A	Basement	0	0	0	0	11
Outside Building 5-D	–	0	0	1	0	0
Outside Building 25	–	0	0	0	2	0
Stairwells	--	0	0	0	Unknown[d]	0

Notes:

[a] Number indicates the quantity of containers storing identified materials. Containers range in size from 5-gallon pails to 55-gallon drums.

[b] If the PID detected organic vapors at greater than background levels, PRC assumed the container holds volatile constituents.

[c] This container appeared to contain latex, but PRC did not investigate closely for safety reasons.

[d] PRC observed 15 containers on stairwells, but PRC did not observe each stairwell at the facility.

Buildings or areas containing containers are not designated as SWMUs because container contents are unknown. Because containers may be holding materials with hazardous constituents, they are considered AOCs.

PRC could not correlate any of the containers it viewed during the VSI with any containers that have been sampled previously. According to the Settlement Proposal, any containers found to hold hazardous substances were physically removed or were to be physically removed from the facility during response actions initiated by the 4(q) Notice (IT, 1990b).

4.1.1 Containers With Liquid Contents

During the VSI, PRC identified 14 containers holding liquids. PRC also identified 15 tightly sealed containers and other containers that could not be accessed for safety reasons. Because PRC did not attempt to open or access these containers, PRC did not determine the physical states of those containers' contents. Containers with liquid and unknown contents were observed in Building 5-D, the first floor of Building 8, the generator room on the first floor of Building 8, Building 9, the first floor of Building 10-A, the basement of Building 13, and the basement of Building 14-A.

PRC observed one 55-gallon drum containing a liquid in Building 5-D. The drum was partially covered with the drum lid, and PRC noted a slight solvent odor in the building upon entry. PRC moved the drum lid slightly when attempting to access the drum's headspace with the PID. The PID detected over 5,000 ppm volatile vapors in the headspace. PRC quickly replaced the drum lid flush over the drum and left the building.

PRC entered Building 8 through a doorway near the railroad spur between Buildings 8 and 9-C. PRC observed a total of seven 55-gallon drums in the first floor of Building 8. One drum was lying on its side near the entrance to the room. In order to avoid contact with a white powder on the floor, PRC avoided this drum. Five other drums were standing upright further into the building, but still near the entrance. Headspace readings were taken in these drums with the PID. The PID did not detect any volatile vapors in three drums, it detected over 5 ppm in one drum, and it detected over 600 ppm in the fifth drum. PRC observed the seventh drum standing upright along the southeast wall of Building 8. This drum was standing in a small puddle of a dark liquid. The PID detected 5 ppm volatile vapors in the headspace of this drum.

PRC observed six 55-gallon drums in a room located in Building 8. The room, located in the northern part of the building's first floor, appeared to be an electrical generator room. Ambient air in the generator room contained between 1 and 2 ppm of volatile vapors based on

PID readings obtained there. Four drums were located against the north wall of the building. Of the four drums, the PID did not detect volatile vapors over background levels in three drums, but it detected over 16 ppm in one drum located near the northeast corner of the room. Two drums were located in the southwest corner of the room. Of the two drums, the PID did not detect volatile vapors over background levels in one drum, but it detected approximately 5 ppm in the other.

PRC observed two 55-gallon drums in Building 9, which appeared to be an electrical generator room. The contents of these drums are unknown, and because they were tightly sealed, PRC could not take headspace PID readings.

PRC observed one 55-gallon drum in the first floor of Building 10. The PID detected approximately 3 ppm volatile vapors in the headspace.

PRC observed one 55-gallon drum in the basement of Building 13. The drum was tightly sealed. Its contents are unknown, and a PID reading was not taken because PRC could not access the drum's headspace.

PRC observed two 40-gallon, steel drums, three 30-gallon, cardboard containers, and six 5-gallon pails (volumes are approximate) in a small room in the basement of Building 14-A. The room appeared to have been used as a maintenance supply room. The building was dark, and because the floor of this room was covered with several inches of liquid, PRC did not enter it. The contents of the containers could not be determined. PRC took a picture of the room in an attempt to determine the wording on the container labels. Labels on the steel drums indicate that the contents of the drums may have been designed for maintenance and sanitation purposes. Labels on the cardboard containers were deteriorated and could not be read from the picture. Labels on the buckets indicate that the contents are probably non-ammoniated strippers and other floor conditioning products.

4.1.2 Containers With Solid or Semisolid Contents

During the VSI, PRC observed eight drums and containers with solid or semisolid contents, and at least 15 5-gallon pails on the stairwells in the production buildings. When PRC could access the containers' headspaces, PRC used a PID to determine the presence of volatile vapors. Based on the PID readings, PRC believes that some of these containers may hold volatile and possibly hazardous constituents. PRC observed containers with solid or semisolid contents outside Building 5-D; on the first floor of Building 6-A, the first floor of Building 7, the fifth floor of Building 12, outside Building 25, and in several stairwells in the manufacturing buildings.

PRC observed one 55-gallon drum outside Building 5-D that contained an unidentified, dark, solid material. The drum was not sealed. Using a PID, PRC determined that the headspace of the drum contained over 26 ppm volatile vapors.

PRC observed two small, overturned buckets in Building 6-A. The buckets were oozing orange-yellow, resinous contents onto the floor of the building. PRC did not detect any volatile vapors near the buckets' contents.

PRC observed one 55-gallon metal drum of a semisolid, light-colored material that resembled latex. The drum was lying on its side, and it appeared that a small amount of spillage from the drum had occurred. Because of heavy, oily staining on the floor surrounding the drum, PRC did not approach the drum or take PID readings at the drum opening.

PRC observed one 55-gallon, metal drum and one 5-gallon pail of unidentified, semisolid substances on the fifth floor of Building 12. The yellow-orange, viscous materials in the drum and pail resembled resins. Both containers were open, and their contents had hardened. Spills of the material in the drum were seen around the base of the drum. The pail was resting on its side and the material inside had oozed onto the floor. PID readings taken near the bucket and pail did not indicate the presence of any volatile vapors.

PRC observed two heavily deteriorated, 30-gallon, fiber containers outdoors on the south side of Building 25. One of the containers was lying on its side, and the other was upright. The bottom of the upright container was bulging, and the light-colored contents of both containers had partially oozed onto the ground. PID readings taken over the drums' contents did not indicate the presence of volatile vapors.

PRC observed about 15 5-gallon pails on two stairwells in the manufacturing buildings. The pails contained grey powder. Signs located near the pails indicated that the pails contain "Foam Powder." Goodwill speculated during the VSI that these pails contain fire-fighting powder of some sort. PRC could not determine the contents of the pails based on the labels.

4.2 TANKS

Based on the VSI and past facility characterizations (Waste Reduction, 1985; IT, 1990b), PRC believes over 300 tanks currently exist at the facility. Many of these tanks currently contain or formerly contained hazardous constituents. For the purpose of clarity, these tanks have been grouped into three categories: (1) underground storage tanks; (2) aboveground, outdoor storage tanks; and (3) aboveground, indoor storage tanks. All tanks previously identified at the facility during response actions initiated by the 4(q) Notice are summarized in Attachment G. Where PRC could determine that a tank contained any materials, PRC could not determine the nature or quantity of its contents, so this information is not provided.

4.2.1 Underground Storage Tanks

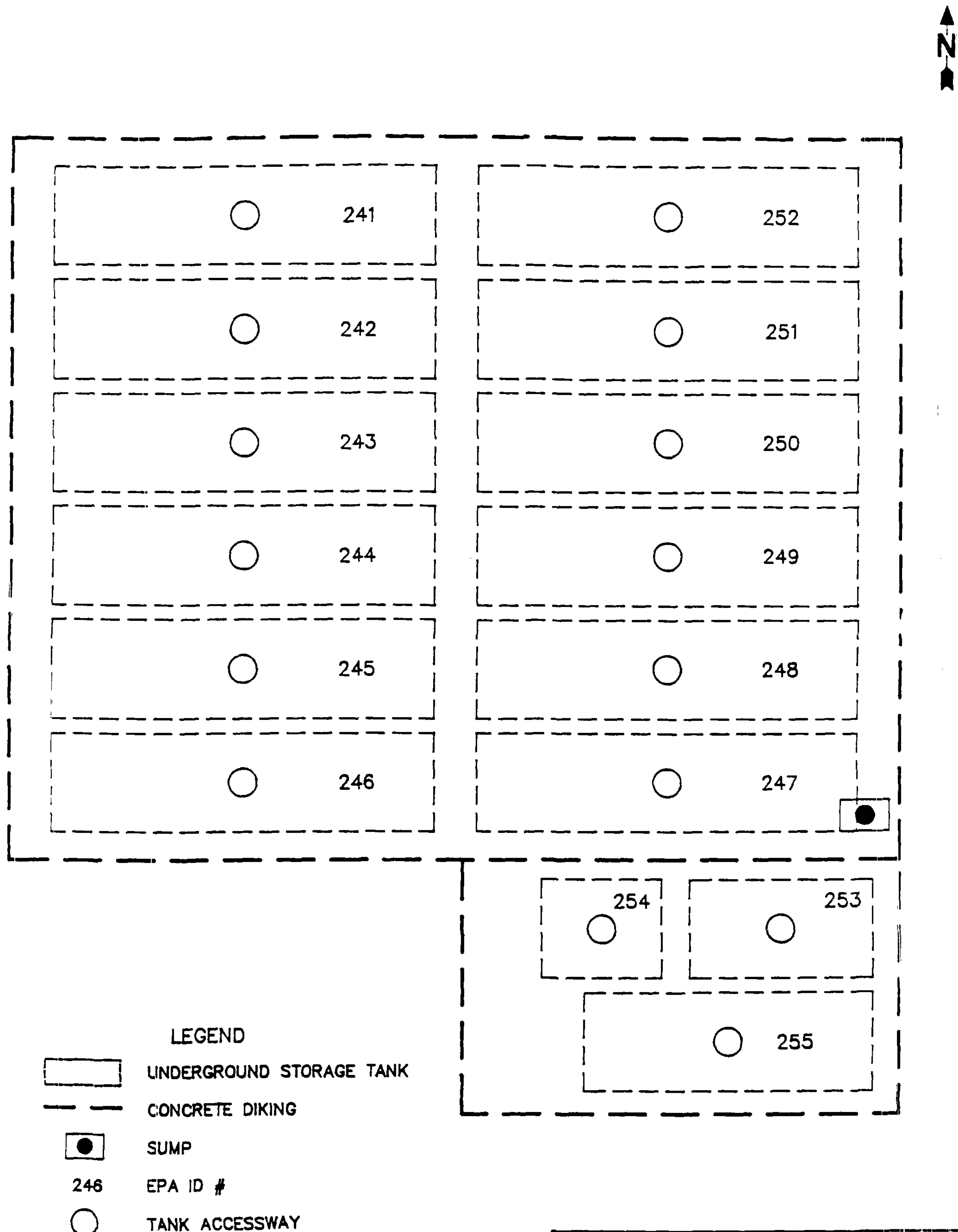
PRC identified five areas containing underground storage tanks. These areas are the North Tank Farm, the South Tank Farm, the Cooper's Pit (Building 7-C), Building 9-C, and Building 11. Based on other information gathered during the PA, PRC identified several areas that may potentially contain underground storage tanks.

The underground storage tanks are designated as AOCs because the tank contents are unknown and may contain hazardous constituents; the integrity of the tanks is unknown; and ground water may be entering the tanks (IEPA, 1987b), implying that the past contents of the tanks may have entered the ground water.

4.2.1.1 North Tank Farm

The North Tank Farm contains 15 underground storage tanks. The locations of the tanks in the North Tank Farm are shown in Figure 3. A summary of the tanks in the North Tank Farm is presented in Table G-1 of Attachment G. Twelve of the tanks have volumes of 8,000 gallons; the other three tanks have volumes less than or equal to 6,000 gallons. Because the North Tank Farm is surrounded by concrete walls about 5 feet high and contains a sump to drain the soils around the tanks, Valspar believes the tanks are enclosed within a concrete vault (IT, 1990b). The integrity of any concrete beneath the tanks, if it exists, is unknown. PRC did not locate any record of borings into the North Tank Farm during the PA and thus could not confirm that concrete underlies the tanks.

Based on information gathered during the PA, PRC attempted to identify the past contents of the tanks in the North Tank Farm. According to the Valspar's May 1990 Closure Plan, three of the 15 tanks in the North Tank Farm require closure, because they were found to contain hazardous waste material in 1985 during response actions initiated by the 4(q) Notice. Tanks containing butyl acetate (D001), butanol (U031), and mineral spirits (D001) were emptied and cleaned. The other 12 tanks were found to be empty (Waste Reduction, 1985). According to the Settlement Proposal, all 15 tanks are currently empty (IT, 1990b).



1330 SOUTH KILBOURN AVENUE
CHICAGO, ILLINOIS

FIGURE 3

NORTH TANK FARM

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: IT, 1990b.

NOT TO SCALE

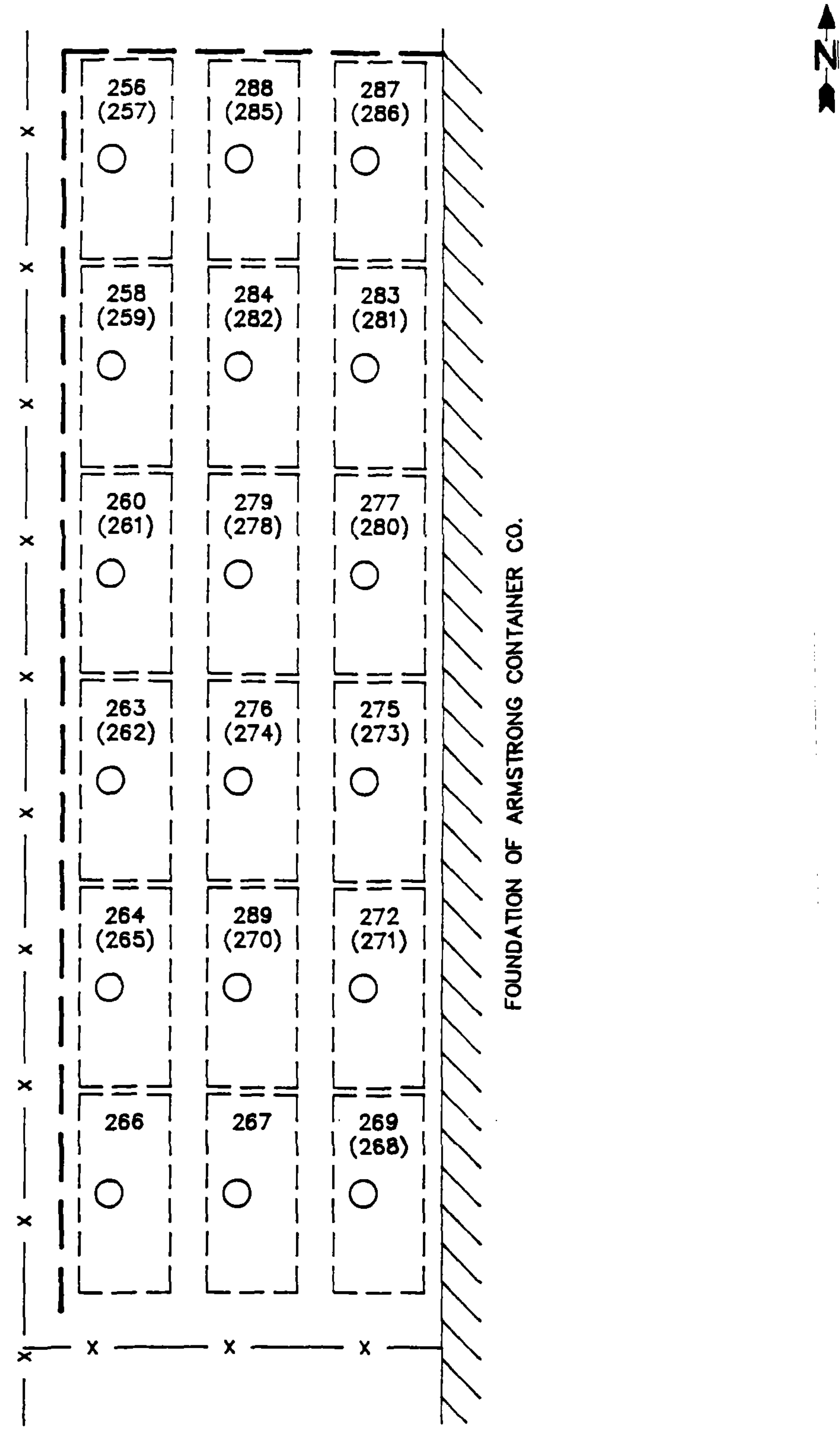
4.2.1.2 South Tank Farm

The South Tank Farm contains 18 underground storage tanks. The locations of the tanks in the South Tank Farm are shown in Figure 4. A summary of the tanks in the South Tank Farm is presented in Table G-2 of Attachment G. Seventeen of the tanks have volumes of 8,000 gallons; the other tank has a volume of 10,000 gallons. The South Tank Farm is surrounded by concrete walls on the north and west sides. The east side of the South Tank Farm is adjacent to the foundation of Armstrong Containers. This side of the South Tank Farm may also have a concrete wall along its length. During the VSI, PRC found no evidence that a wall exists at the southern end of the tank farm. The presence of a concrete pad beneath the tank farm could not be determined. Valspar believes that this tank farm is underlain by clay (IT, 1990a). PRC did not locate any record of borings into the South Tank Farm during the PA and thus could not confirm the presence of concrete or clay beneath the tanks.

Based on information gathered during the PA, PRC attempted to identify the past contents of the tanks in the South Tank Farm. According to the Valspar's May 1990 Closure Plan, 10 of the 18 tanks in the South Tank Farm require closure, because they were found to contain hazardous waste material in 1985 during response actions initiated by the 4(q) Notice. Tanks containing mineral spirits (D001) and an unknown solvent blend Valspar believes contains butanol, 2-butanone, ethylbenzene, mineral spirits, toluene, and xylene (D001) were emptied and cleaned. One tank was found to be empty (Waste Reduction, 1985). According to the Settlement Proposal, the remaining seven tanks contain various quantities of nonhazardous materials, possibly including fuel oil, mineral spirits, linseed oil, and varnishes (IT, 1990b).

4.2.1.3 The Cooper's Pit

The Cooper's Pit contains 15 underground storage tanks, 10 of which are actually located within the walls of Building 7-C (Waste Reduction, 1985). The locations of the tanks in the Cooper's Pit are shown in Figure 5. A summary of the tanks in the Cooper's Pit is presented in Table G-3 of Attachment G. The tanks range in volume between 4,050 and 25,000 gallons. Two of the tanks have volumes less than 5,000 gallons; seven have volumes between 5,000 and 10,000 gallons; and six have volumes greater than 10,000 gallons. The Cooper's Pit is surrounded by concrete walls on all sides, and borings into the soils in this area below the depths of the tanks have hit concrete (IT, 1990b). The integrity of the concrete beneath the tanks is unknown. PRC could not confirm that the concrete beneath the tanks is connected to the walls surrounding the Cooper's Pit.



LEGEND

▭	UNDERGROUND STORAGE TANK
○	TANK ACCESSWAY
—— x ——	FENCE
276 (274)	EPA ID #

GOODSTNK.DWG – 09/06/91 – CER

SOURCE: IT, 1990b.

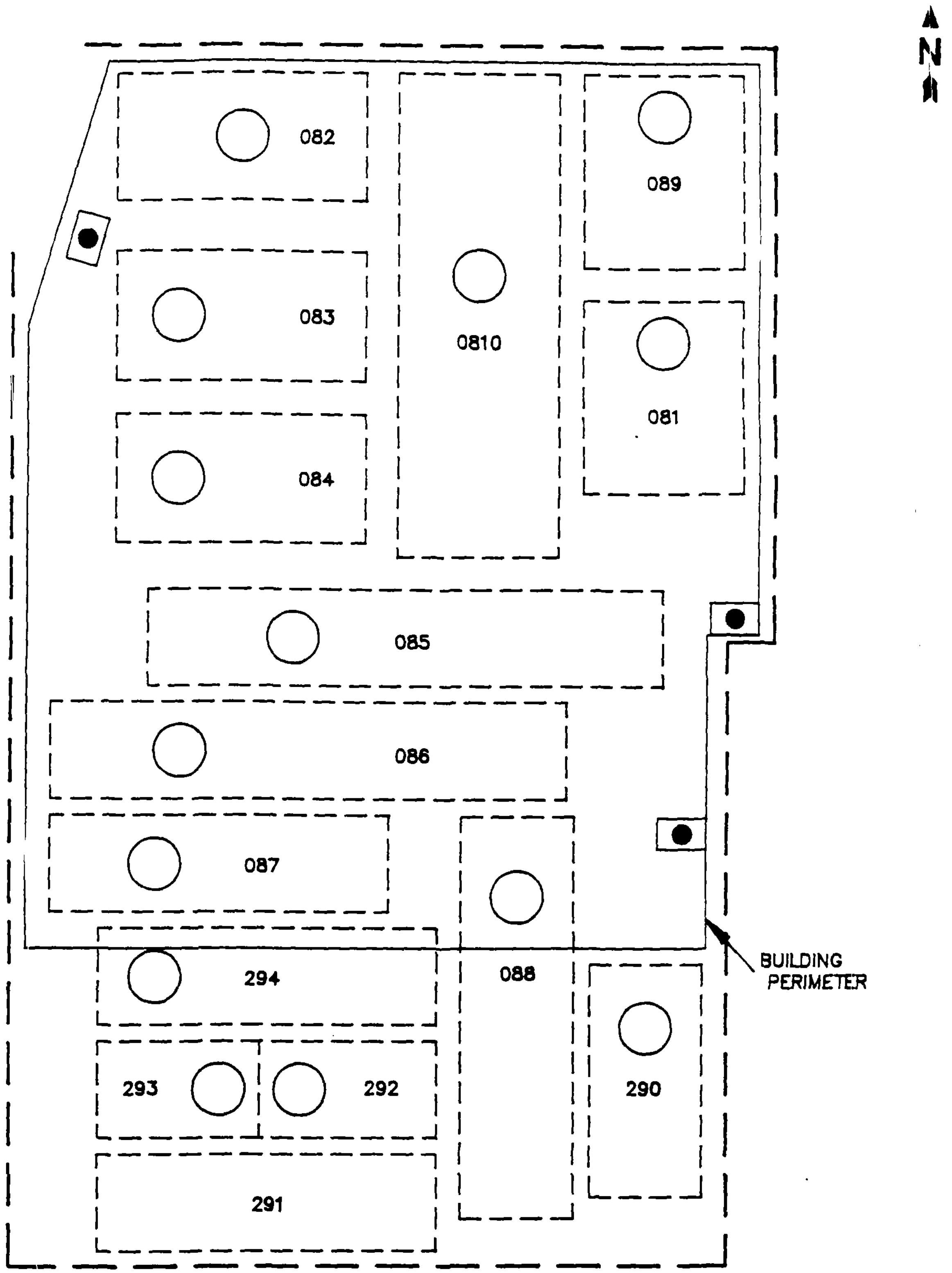
NOT TO SCALE

1330 SOUTH KILBOURN AVENUE
CHICAGO, ILLINOIS

FIGURE 4

SOUTH TANK FARM

PRC ENVIRONMENTAL MANAGEMENT, INC.



LEGEND

UNDERGROUND STORAGE TANK

CONCRETE DIKING

SUMP

036 EPA ID #

TANK ACCESSWAY

SOURCE: IT, 1990b.

NOT TO SCALE

1330 SOUTH KILBOURN AVENUE
CHICAGO, ILLINOIS

FIGURE 5

COOPER'S PIT UNDERGROUND TANK FARM

PRC ENVIRONMENTAL MANAGEMENT, INC.

Based on information gathered during the PA, PRC attempted to identify the past contents of the tanks in the Cooper's Pit. According to the Valspar's May 1990 Closure Plan, 10 of the 15 tanks in the Cooper's Pit require closure, because they were found to contain hazardous waste material in 1985 during response actions initiated by the 4(q) Notice. Tanks containing naphtha (D001), isopropanol (D001), 2-butanone (U159), water and cellosolve (D001), xylene (U239), water and kerosene (D001), and a solvent blend that Valspar believes contains butanol, 2-butanone, ethylbenzene, mineral spirits, toluene, and xylene (D001) were emptied and cleaned. One tank was found to be empty (Waste Reduction, 1985). According to the Settlement Proposal, the remaining four tanks contain nonhazardous material, possibly including oil, texanol, water, toluene, and naphtha.

4.2.1.4 Building 9-C

PRC did not observe any underground storage tanks in Building 9-C. However, information gathered after the VSI indicates that three underground storage tanks exist beneath this building. PRC is uncertain about the location of these tanks and did not observe any accessways to them during the VSI. For these reasons, PRC is not providing a map of these tanks in this PA/VSI report. A summary of the underground storage tanks in Building 9-C that have been previously identified is presented in Table G-4 of Attachment G. These tanks contain fuel oil used in the engines and boilers in the facility. Valspar's May 1990 Closure Plan did not address any of these tanks, so PRC assumes that Valspar believes that these tanks do not require closure (IT, 1990a). According to Valspar, one 25,000-gallon tank is empty; the other 25,000-gallon tank contains 1,200 gallons of fuel oil; and the 10,000-gallon tank contains about 200 gallons of fuel oil (IT, 1990b).

4.2.1.5 Basement of Building 11

The basement of Building 11 contains seven tanks Valspar classified as underground storage tanks (Waste Reduction, 1985). However, the Settlement Proposal indicates that only three underground storage tanks are located beneath Building 11 (IT, 1990b). Because of the uncertainty of tank numbers and locations, PRC is not providing a map of these tanks in this PA/VSI report. A summary of the three tanks that have been previously identified is presented in Table G-5 of Attachment G. PRC observed parts of three tanks behind a wall in the basement of Building 11. These tanks were partially covered with soil. PRC could not see beyond these three tanks. Because PRC observed piping leading away from the tanks beyond PRC's field of vision, and because PRC observed that soil was sloped away from the three tanks that it did observe, PRC believes that more tanks may be located beneath Building 11. IEPA did not inventory the three tanks that PRC observed during its inspections of the facility. The total number of underground tanks beneath Building 11 is unknown.

Based on information gathered during the PA, PRC attempted to identify the past contents of the tanks beneath Building 11. Valspar's May 1990 Closure Plan did not address any of these tanks, so PRC assumes that Valspar believes that these tanks do not require closure (IT, 1990a). According to Valspar, one 3,500-gallon tank contains a clear, viscous resin that is nonhazardous; another 3,500-gallon tank and one 7,000-gallon tank are empty or mostly empty, and contain a small quantity of an unknown, hard, solid material (Waste Reduction, 1985).

4.2.1.6 Areas Potentially Containing Underground Storage Tanks

During the VSI, Goodwill representatives stated that they believe an underground storage tank farm may exist in the area west of the Building 3 complex. This area corresponds to the former resin manufacturing buildings. PRC attempted to locate information about this alleged tank farm during the PA/VSI. Goodwill representatives stated that Goodwill is in possession of maps indicating these tanks near the west end of the facility. PRC obtained these maps from Goodwill through RERC, but the maps do not indicate the existence of any tank farm other than those addressed above. According to these maps, the only underground storage tank farms in existence at the facility are the North Tank Farm and the South Tank Farm (Armstrong Paint, 1944).

During the VSI, PRC attempted to locate the tank farm alleged by Goodwill to exist at the facility. The former resin production buildings were burned to the ground in 1982. The area has been graded with fill, and any underground storage tank accessways would have been covered with fill during the destruction of the fire-damaged buildings. PRC could only see the fill and a small area of the old buildings' foundations. Because underground storage tanks exist in the Cooper's Pit (Building 7-C), and because past operators stored materials in other underground storage tanks at the facility, PRC believes that underground storage tanks might have once been used to store resins or raw materials used to make resins in the former resin production area. This area corresponds to the west-central portion of the facility. IEPA has reportedly test-pitted the area, but PRC did not locate the results of the test-pitting during the PA.

During the VSI, PRC observed three pits inside the basement of Buildings 12 and one pit in the basement of Building 14. Goodwill stated during the VSI that some of these pits may be underground tanks. All of the pits were filled with liquid, and Goodwill stated that one of the pits is at least 10 to 15 feet deep. PRC believes that these pits may be underground storage tanks.

These pits may provide a possible route for contaminants to enter subsurface soils and possibly ground water.

4.2.2 Aboveground, Outdoor Storage Tanks

PRC identified two aboveground, outdoor storage tanks during the VSI. These tanks are steel, vertical, 20,000-gallon tanks located near the west-central portion of the facility. The tanks were beginning to rust, but they appeared to be sound. No secondary containment for these tanks was observed. During the VSI, Valspar representatives stated that Valspar believes the tanks were used to store solvents. PRC could not determine what types of solvents were stored in these tanks. Based on the constituents of solvent blends located in underground storage tanks at the facility, PRC believes that these tanks may have contained butanol, 2-butanone, ethylbenzene, mineral spirits, toluene, xylene, or other solvents. Inventories conducted by Waste Reduction and IT have indicated that these tanks were empty (Waste Reduction, 1985; IT, 1990b). The locations of these tanks is shown in Figure 2. Table G-6 in Attachment G summarizes the information known about the two tanks.

The aboveground, outdoor storage tanks are not considered SWMUs because Valspar alleges that only raw materials and product were left on site and all wastes removed. They are designated as AOCs because the tank contents are unknown and may contain hazardous constituents.

4.2.3 Aboveground, Indoor Storage Tanks

PRC identified approximately 250 aboveground, indoor storage tanks during the VSI. These tanks varied in size, shape, and condition, and were located throughout the plant in virtually every storage and production area. These tanks reportedly stored solvents, resins, latexes, and tars. This subsection describes the aboveground, indoor storage tanks observed by PRC during the VSI. Tanks are described by building and floor for the reader's convenience. PRC did not attempt to correlate each tank with specific activities, because the available information only provides an estimation of each tank's former use.

The aboveground, indoor storage tanks are not considered SWMUs because Valspar alleges that only raw materials and product were left on site and all wastes removed. They are designated as AOCs because the tank contents are unknown and may contain hazardous constituents. Also, PRC observed leaking, indoor storage tanks and associated pipelines during the VSI.

4.2.3.1 Building 3

PRC observed 11 tanks in Building 3. A summary of the tanks in Building 3 is provided in Table G-7 of Attachment G. These tanks range in volume between 2,000 and 6,000 gallons. Building 3 was once used as a resin storage area and was not used by Valspar (IT, 1990b). PRC was able to look inside the base of one of the tanks and found that it contained a thick, viscous, dark-colored substance. Based on the consistency and smell of the substance, Valspar stated that this tank probably contains varnish. PRC noted an odor similar to that of varnish in this building. PRC did not note any spills that had reached the outside of the building, although areas of the floor on the west side of the building were freshly stained with a dark, viscous substance. PRC believes that these stains were formed by leaking pipes or containers in Building 3. According to the Settlement Proposal, 10 of the 11 tanks were empty in 1985, during response actions initiated by the 4(q) Notice. The remaining tank contains a black liquid that is nonhazardous according to the Valspar (IT, 1990b).

This building is an AOC because PRC could not determine the contents of its tanks. PRC observed a spill area inside the building.

4.2.3.2 Building 3-B

PRC observed 18 tanks in Building 3-B. A summary of the tanks in Building 3-B is provided in Table G-8 of Attachment G. These tanks range in volume between 8,000 and 20,000 gallons, with 12 of the tanks being 10,000 gallons or greater in capacity. Building 3-B was once used as a resin storage area (IT, 1990b). Due to the fact that a number of trenches and possibly pits were obscured by debris, PRC did not attempt to visually inspect each tank in this building closely. The floor of this building is covered with liquid and sludge. PRC believes that these materials may have leaked from the tanks and associated pipelines in this building. PRC noted a slight resinous odor in this building, but the PID did not detect any volatile vapors. According to the Settlement Proposal, all 18 tanks contain hard, solid resins and clear liquids. Based on Valspar's identification of past contents of these tanks (IT, 1990b), PRC believes that these materials may include hardened and liquid rosin, tall oil, linseed oil, and glycerin.

This building is an AOC because PRC could not determine the contents of its tanks. PRC observed sludge and liquid on the floor and in the trenches in this building. This material may have been released from the tanks.

4.2.3.3 Building 5-A

PRC observed 11 tanks in Building 5-A. A summary of the tanks in Building 5-A is provided in Table G-9 of Attachment G. Seven of the tanks range in volume between 50 and 330 gallons. Two of the other tanks contain volumes of 1,000 gallons, and the remaining two tanks contain volumes of 2,500 gallons. This building was used as a resin and oil storage area and was not used by Valspar (IT, 1990b). Building 5-A is divided into an upper and a lower floor. A staircase is located at the south end of the building. Because the building is small, PRC addresses the tanks in this building together. PRC observed tarry substances in at least two of these tanks; the same tarry substance was located on the floor below the tanks. According to the Settlement Proposal, eight of the 11 tanks were empty in 1985, during response actions initiated by the 4(q) Notice. One tank contained a hazardous brown-black oil (D001); that tank was emptied and cleaned by Valspar. The remaining two tanks contain a yellow oil and solids. Valspar claims that these materials are nonhazardous (IT, 1990b). PRC could not determine whether eight tanks were empty because PRC could not see into the tanks.

This building is an AOC because PRC could not determine the contents of its tanks. A tarry substance on the floor may have been released from these tanks.

4.2.3.4 Building 5-B

PRC identified one large tank unit and one small tank unit in this building. A summary of the tanks in Building 5-B is provided in Table G-10 of Attachment G. The small tank unit contains a volume of about 500 gallons. The large tank unit holds three tanks ranging in volume between 1,250 and 2,250, with a total capacity of 5,750 gallons. Valspar used this building as a resin and oil storage area (IT, 1990b). The 500-gallon tank unit was cut open and cleaned in 1985, during response actions initiated by the 4(q) Notice, because it contained a hazardous mixture of resin and oil (D001). Valspar believes that the contents of the other three tanks are nonhazardous. The contents of these tanks are described as dark solids and a clear liquid (IT, 1990b). PRC did not observe the contents of these tanks.

This building is an AOC because PRC could not determine the contents of its tanks.

4.2.3.5 Building 5-C

PRC could not count the tanks in Building 5-C, because the floor of the building was covered with several feet of a rust-colored liquid. Information provided to PRC after the VSI indicates that this building contains seven 9,000-gallon tanks and one 9,250-gallon tank. Valspar used this building as a resin and oil storage area (IT, 1990b). A summary of the tanks in Building 5-C is provided in Table G-11 of Attachment G. PRC believes that some or all of this liquid may have leaked from the tanks and associated pipelines in this building. During the 1985 response actions initiated by the 4(q) Notice, Valspar cleaned and emptied four of the eight tanks, because the tanks contained hazardous waste materials, including alkyd resins (D001) and a mixture of resin and oil (D001). Valspar claims that the other four tanks contain various nonhazardous alkyd resins (IT, 1990b).

This building is an AOC because PRC could not determine the contents of its tanks. The floor of the building is covered with several feet of liquid that may have been released from the tanks or deliberately placed in the building by unauthorized persons.

4.2.3.6 Building 6

PRC estimated the number of tanks it observed in this building to be greater than 90. PRC did not count each tank because many tanks were located overhead and could not be accessed. According to information provided to PRC after the VSI, Building 6 contains 104 tanks ranging in volume between 800 and 8,000 gallons. A summary of the tanks in Building 6 is provided in Table G-12 of Attachment G. A total of 12 tanks have capacities of 800 gallons; 76 tanks have capacities between 1,250 and 4,250 gallons; and 16 tanks have capacities of 5,000 or more gallons. Because of the number and inaccessibility of some tanks in this building, PRC did not closely investigate each tank. Valspar describes the past use of this building as a resin and paint-related oil storage area (IT, 1990b). Several of the tanks or pipelines located above the aisles were leaking, but PRC could not determine the exact source of the leaks. The leaks consisted of thick, resinous streams of material that originated above the steel tank supports. Large pools of liquid and the leaking material were observed in Building 6. According to the Settlement Proposal, 29 of the 104 tanks were empty in 1985, during response actions initiated by the 4(q) Notice. An additional 40 tanks contained hazardous waste materials and were cut open and cleaned. The tanks contained linseed oil (D001), alkyd resins (D001), mixtures of resin and oil (D001), and urethane (D001). Valspar claims that the remaining 35 tanks contain nonhazardous materials, including linseed oil, various alkyd resins, and mixtures of resin and oil. Three of the tanks in this building may have once contained propylene glycol, ethylene glycol, and hexylene glycol. However, these tanks were reportedly empty in 1985 (IT, 1990b).

This building is an AOC because PRC could not determine the integrity or contents of its tanks; because PRC observed materials leaking from tanks or pipelines associated with tanks in this building; and because PRC observed released material on the floor.

4.2.3.7 Building 6-A

PRC observed three tanks on a catwalk in Building 6-A. A summary of the tanks in Building 6-A is provided in Table G-13 of Attachment G. Two of these tanks have a capacity of 350 gallons and the other tank has a capacity of 150 gallons. Valspar used this building as a resin storage area (IT, 1990b). PRC did not climb onto the catwalk for safety reasons, so these tanks were not closely investigated. According to the Settlement Proposal, the smallest tank was empty in 1985, during response actions initiated by the 4(q) Notice. Valspar claims that the other two tanks contain a nonhazardous liquid (IT, 1990b).

This building is an AOC because PRC could not determine the integrity or contents of its tanks.

4.2.3.8 Third Floor of Building 7

PRC observed 20 tanks on the third floor of Building 7. A summary of the tanks on the third floor of Building 7 is provided in Table G-14 of Attachment G. Eighteen of these tanks range in capacity from 450 to 1,000 gallons, and two tanks have capacities of 1,600 gallons. Information obtained after the VSI indicates that a 10-gallon glue pot is also located on this floor of the building. Valspar used this floor of the building as a process area. Paint was mixed, tinted, and thinned in the tanks located in this room (IT, 1990b). PRC observed tanks along the south, west, and north walls in this building. The tops of many of the tanks were open, and PRC observed paint residues in these tanks. Exceptions included three tanks that had been cut open and cleaned. According to the Settlement Proposal, 15 of the 20 tanks were empty in 1985, during response actions initiated by the 4(q) Notice. One tank contained a thin coating of solid material and was considered empty. Three tanks contained hazardous materials and were cut open and cleaned. One of these three tanks is a 900-gallon tank contained paint residues (D001); the two 1,600-gallon tanks contained residues of liquid organic wastes that they stored (D001, D008). Valspar claims that one tank and the glue pot contain nonhazardous materials, including paint mixtures and hardened glue (IT, 1990b).

Valspar identified the two 1,600-gallon tanks as having been used to store liquid organic waste. PRC could not determine the constituents of this waste. Based on the waste codes used to identify it, the waste contained lead and ignitable materials. According to Valspar's RCRA Part A permit application, Valspar's closure plans, and the closure certification provided by Rapps, these tanks were not permitted (Valspar, 1980c; 1985; Rapps, 1985).

The third floor of Building 7 is an AOC because PRC could not determine the contents of its tanks and because PRC observed paint residues in many of the tanks.

4.2.3.9 *Fifth Floor of Building 7*

PRC observed five tanks on the fifth floor of Building 7. A summary four of the tanks on the fifth floor of Building 7 is provided in Table G-15 of Attachment G. Information provided to PRC after the VSI indicate that four tanks with capacities of 500 gallons were used on this floor of the building. Valspar did not use this floor of the building during the time it operated at the facility (IT, 1990b). PRC assumes that the tanks located on this floor were left at the facility by operators of the facility before 1976, when Valspar began operating there. Three of the four tanks identified by Valspar are located along the east wall near the southeast corner. The fourth tank identified by Valspar is located against the north wall on a weigh scale. A fifth tank, identified by PRC but not by Valspar, is located along the south wall in the southeast corner. According to the Settlement Proposal, two of the four tanks were empty in 1985, during response actions initiated by the 4(q) Notice. A third tank contained an unknown, hazardous waste material (D001); that tank was cut open and cleaned during the response actions. The fourth tank contains an unknown, rust-colored liquid that Valspar considers to be nonhazardous (IT, 1990b).

The fifth floor of Building 7 is an AOC because PRC could not determine the contents of its tanks and because all tanks in the building have not been identified in previous facility characterizations.

4.2.3.10 **Building 7-B**

PRC did not identify any tanks in Building 7-B. However, previous inventories of the facility have noted that one tank is located in this building. A summary of the tank in Building 7-B is provided in Table G-16 of Attachment G. PRC believes that it overlooked the 800-gallon tank identified by Valspar or that the tank has been removed from the facility since Valspar performed the tank inventory prior to 1987 (Kinsey, 1987). Valspar used Building 7-B as a resin storage area, but Valspar believes that the tank contains caustic sludge. The pH of the sludge is below RCRA regulatory levels (IT, 1990b).

This building is an AOC because PRC could not locate a tank that is alleged to exist there.

4.2.3.11 Third Floor of Building 8

PRC observed 18 tanks on the third floor of Building 8. A summary of the tanks on the third floor of Building 8 is provided in Table G-17 of Attachment G. Nine of the tanks have capacities ranging between 550 and 900 gallons; the other nine tanks have capacities ranging between 1,000 and 1,600 gallons. Valspar used this floor of the building as a process area. Paint was mixed, tinted, and thinned in the tanks located in this room (IT, 1990b). Seventeen of the tanks are aligned against the south and west walls, and one tank is located in the center of the building. PRC noted that at least six of these tanks had been cut open and cleaned. According to the Settlement Proposal, 10 of the 18 tanks were empty in 1985 during response actions initiated by the 4(q) Notice. Seven of the tanks contained hazardous materials and were cut open and emptied. These tanks contained various paint mixtures (D001). The remaining tank was not used by Valspar. According to Valspar, it contains an unknown, nonhazardous liquid material (IT, 1990b).

The third floor of Building 8 is an AOC because PRC could not determine the contents of its tanks.

4.2.3.12 First Floor of Building 10

PRC observed four large tanks hidden behind two doorways on the first floor of Building 10. A summary of the tanks on the first floor of Building 10 is provided in Table G-18 of Attachment G. Valspar used this floor of the building as a process area. The four tanks that PRC observed have capacities of about 8,000 gallons. At least two of the four tanks that PRC observed were used to store paint returned to the plant for reformulation (IT, 1990b). Past inventories have noted that three other 1,200-gallon tanks were used to neutralize caustic wastewater in this building, and that one tank in this building contained acid (Waste Reduction, 1985; IT, 1990b). PRC did not observe these tanks in Building 10 during the VSI. However, PRC did observe three tanks in Building 10-A during the VSI. Based on PRC's estimates of the capacities of these tanks, they may correspond to the three caustic wastewater neutralization tanks identified by Valspar. PRC did not locate the 60-gallon acid tank identified by Valspar. This tank may have been removed from the facility after Valspar's last inventory of the facility prior to 1987 (Kinsey, 1987), or PRC may have overlooked this small tank. According to the Identified Response and the Settlement Proposal, the 60-gallon acid tank and two of the 8,000-gallon tanks were empty in 1985, during response actions initiated by the 4(q) Notice. Valspar claims that the remaining five tanks contain nonhazardous liquid and solid materials. These materials may include caustic solutions or sludges and paint mixtures (IT, 1990b; Waste Reduction, 1985).

The first floor of Building 10 is an AOC because PRC could not determine the contents of its tanks and because PRC could not locate each of the tanks alleged to exist there.

4.2.3.13 Second Floor of Building 10

PRC did not locate any accessways into the second floor of Building 10 and therefore was unable to observe any tanks there. Valspar apparently used this floor of the building as a process area. Information provided to PRC after the VSI indicates that two 3,800-gallon tanks and one 800-gallon tank exist on the second floor of Building 10. A summary of the tanks on the second floor of Building 10 is provided in Table G-19 of Attachment G. According to Valspar, all three tanks contain nonhazardous, solid, black residues or clear, yellow oil. These materials may include dried paint and oils used to make paint (IT, 1990b; Waste Reduction, 1985).

The second floor of Building 11 is an AOC because PRC could not investigate this floor of the building. PRC also could not identify the contents of its tanks.

4.2.3.14 Basement of Building 11

PRC observed four aboveground storage tanks in the basement of Building 11. Valspar used this floor of the building as a process area (IT, 1990b). A summary of the tanks in the basement of Building 11 is provided in Table G-20 of Attachment G. Based on gauges attached to these tanks, PRC estimates that the volume of each tank is approximately 12,000 gallons. Past inventories by Valspar indicate a total of four tanks, each having a capacity of only 4,000 gallons. PRC is uncertain about these apparent discrepancies in the tank volumes. All four of the tanks identified by Valspar were empty in 1985, during the response actions initiated by the 4(q) Notice, and Valspar claims that it did not use these tanks during its period of operations at the facility (IT, 1990b).

The basement of Building 11 is an AOC because PRC could not determine the contents of its tanks and because past inventories of this area do not agree with PRC's observations.

4.2.3.15 First Floor of Building 11

PRC observed one tank against the south wall of the first floor of Building 11. A summary of the tank on the first floor of Building 11 is provided in Table G-21 of Attachment G. The tank appeared to be a 20-cubic-yard roll-off box with a fitting placed over a hole in its top to allow for filling and emptying operations. Valspar used this building as a process area, and the tank was probably used to store bulk titanium dioxide slurry. According to the Settlement Proposal, this 5,000-gallon tank contains a nonhazardous, saturated, solid sludge cube (IT, 1990b).

This building is an AOC because PRC could not determine the contents of the tank.

4.2.3.16 Basement of Building 12

PRC observed three tanks against the east wall of the basement of Building 12. A summary of the tanks in the basement of Building 12 is provided in Table G-22 of Attachment G. Valspar used this floor of the building as a process area. These tanks each have a capacity of 1,200 gallons. The tanks were used as part of a caustic cleaning system (IT, 1990b). PRC noted that the tanks were labeled "Caustic." Because the tanks were part of a caustic cleaning system, PRC believes that they may have been a SWMU at one time. These tanks likely generated caustic sludges and stored them for short periods of time. According to the Settlement Proposal, one of the three tanks was empty in 1985, during the response actions initiated by the 4(q) Notice. Valspar claims that the other two tanks contain nonhazardous liquid and solid materials (IT, 1990b). These materials may include caustic liquids and sludges generated from cleaning paint tanks.

This building is an AOC because PRC could not determine the contents of its tanks. Based on past operations, these tanks may store materials with hazardous constituents.

4.2.3.17 Third Floor of Building 12

PRC observed 23 tanks with capacities ranging between 900 and 1,600 gallons, and one 30-gallon drum, on the third floor of Building 12. A summary of the tanks on the third floor of Building 12 is provided in Table G-23 of Attachment G. Valspar used this floor of the building as a process area. The tanks were used to mix, tint, and thin paints. The drum was used to store caustic wastewater (IT, 1990b). According to the Settlement Proposal, 21 of the 24 tanks were empty in 1985, during response actions initiated by the 4(q) Notice. According to Valspar, the remaining three tanks contain nonhazardous materials, including sludge materials, clear liquids, and white solids. These materials may include paint mixtures as well as caustic liquids and sludges. PRC observed solid materials that resembled hardened resins in the outlets of at least two of these tanks.

The third floor of Building 12 is an AOC because PRC could not determine the contents of its tanks and because PRC observed hardened materials in at least two of these tanks.

4.2.3.18 Fourth Floor of Building 12

PRC observed one tank on the fourth floor of Building 12. A summary of the tank on the fourth floor of Building 12 is provided in Table G-24 of Attachment G. This tank has a capacity of 800 gallons and was probably used as part of a caustic cleaning system. Valspar used this building as a process area (IT, 1990b). PRC did not observe any standing liquids in this tank, and Valspar describes the tank's contents as nonhazardous caustic sludge (IT, 1990b).

The fourth floor of Building 12 is an AOC because PRC could not determine the contents of its tank.

4.2.3.19 Fifth Floor of Building 12

PRC observed three 500-gallon tanks on the fifth floor of Building 12. A summary of the tanks on the fifth floor of Building 12 is provided in Table G-25 of Attachment G. Valspar used this floor of the building as a process area. Valspar claims that it did not use at least two of the three tanks during the period that it operated at the facility. According to the Settlement Proposal, all three of the tanks were empty in 1985, during response actions initiated by the 4(q) Notice, and the past uses of these tanks are unknown (IT, 1990b).

This building is an AOC because PRC could not determine the contents of its tanks.

4.2.3.20 Building 15-A

PRC did not observe any tanks in Building 15-A. According to information provided to PRC after the VSI, three tanks were used in this building during the period that Valspar operated at the facility. A summary of the tanks that were once located in Building 15-A is provided in Table G-26 of Attachment G. These tanks were removed prior to the 1985 response actions initiated by the 4(q) Notice. According to the Settlement Proposal, these 12,000-gallon tanks contained acrylic emulsions (IT, 1990b).

This building is an AOC because PRC could not determine whether the tanks previously located there leaked their contents to the floor.

4.2.3.21 Building 15-B

PRC observed five tanks in Building 15-B. A summary of the tanks in Building 15-B is provided in Table G-27 of Attachment G. Four of these tanks have capacities of 4,500 gallons;

the other tank has a capacity of 2,100 gallons. Valspar used this building as a resin storage area (IT, 1990b). The floor of this building was coated with latex and resins during the VSI. PRC believes that pipelines or tanks are leaking or have leaked onto the floor. Because the floor in this building was coated with materials that appeared to have been released from the tanks, PRC did not closely investigate each tank. According to the Settlement Proposal, two of the five tanks were empty in 1985, during the response actions initiated by the 4(q) Notice. Valspar claims that the other three tanks contain nonhazardous materials, including brown oil and latex liquids (IT, 1990b).

This building is an AOC because PRC could not determine the integrity or contents of its tanks and because material on the floor may have been released from the tanks.

4.3 PIPING RACEWAYS

During the PA, Goodwill informed PRC that piping raceways exist throughout the facility. During the VSI, Goodwill further stated that several of the piping raceways were connected with Armstrong Containers. PRC observed several piping raceways that appeared to lead to the Armstrong Containers plant. During the VSI, Valspar stated that when the entire property was owned by Armstrong Paint, piping existed between the two plants. Valspar further stated that the pipelines were cut when Armstrong Paint sold the property that Valspar used during its period of operations at the facility.

PRC observed piping raceways both indoors and outdoors throughout the facility. Some of the raceways are aboveground tunnels that can be accessed without any difficulty. In particular, raceways run in tunnels along both sides of the main railroad spur that cuts through the facility. Other raceways are located on building exteriors and ceilings and are too high to reach without a ladder. PRC observed what appeared to be resins leaking from several pipelines indoors and outdoors at the facility. Based on past sampling that has been performed at the facility, these resins may contain acetone, benzene, 2-butanone, ethylbenzene, 2-hexanone, toluene, and xylenes (see Tables 3 and 4). Other materials may also be present in the leaking materials.

Some raceways run through underground tunnels. Due to safety considerations, PRC did not enter any of these tunnels to investigate the raceways. Underground raceways were observed at the south end of the facility near the railroad tracks. Other unknown, underground raceways may be present at the facility, but PRC did not locate them during the VSI.

The piping raceways constitute an AOC because PRC could not observe many of the raceways located throughout the facility, because PRC observed leaks from piping, and because releases to the environment from piping have occurred.

4.4 OUTDOOR SPILL AREAS

PRC identified four, outdoor areas on facility property that appear to have received spills in the past. These areas include the concrete pad east of Building 25, the railroad spur, the Cooper's Pit, and the pipelines west of the Cooper's Pit.

The outdoor spill areas constitute an AOC because PRC could not determine the constituents or quantity of released material. Spilled material may be contributing to groundwater, surface water, and soil contamination at the facility.

4.4.1 Concrete Pad East of Building 25

PRC observed several spills of a dark substance that may be paint on the concrete pad east of Building 25. The spills cover an area of at least 75 square feet. Based on historical pictures of this area, PRC believes that the pad was used to store miscellaneous equipment removed from the facility when it was being vacated (Rapps, 1985). During the VSI, this area contained a large quantity of rubbish, including scrap metal, wooden pallets, and empty paint cans. The spills originated near the southeast corner of Building 25 and appear to have flowed toward a drain located in the middle of the pad. Valspar and Goodwill representatives were present during this portion of the VSI, but neither party knew whether the drain is operational or where its outfall is located. Based on pictures taken in 1985 (Rapps, 1985) and information provided to PRC after the VSI, PRC believes that this area may have been used as a container storage area (IT, 1990b).

4.4.2 Railroad Spurs

PRC observed areas of stressed vegetation along the two railroad spurs running through the facility. Miscellaneous rubbish, paint and varnish chips, damp areas, leaking pipes, and discarded generator equipment were observed along the spurs. Because product material was probably unloaded from railcars at the spurs, PRC believes that small spills may have routinely occurred in this area. Soil samples collected by RERC in December 1989, indicated that soils along a railroad spur contain lead levels as high as 690 ppm. The EP Toxic level of lead in the same soil sample was reported at 0.4 mg/L (RERC, 1990a). Table 4 summarizes the RERC sampling results. An electrical engine is located along the spur east of Building 9. Because PCB contamination associated with electrical equipment has been identified in facility buildings (see Tables 3 and 4), PRC believes that the railroad spur may also be contaminated with PCBs.

4.4.3 The Cooper's Pit

PRC observed a large quantity of debris in the Cooper's Pit (Building 7-C), including articles of clothing, dust, chipped paint, paint spills, and hundreds of drum bungs. Soil samples collected from the earthen Cooper's Pit floor by RERC in December 1989, have indicated lead levels as high as 230 ppm, with EP Toxic levels as high as 0.4 mg/L (RERC, 1990a). RERC's sampling efforts are summarized in Table 4. Studies undertaken by Valspar have identified soils in the Cooper's Pit containing levels of lead as high as 215 mg/kg, with EP Toxic levels as high as 0.10 mg/L (Weston, 1989). Table 2 summarizes Valspar's sampling efforts.

A PCB wipe sample collected in the Cooper's Pit by the Weston TAT in September 1990, indicated that PCBs were present in the form of Aroclor 1254 at a level of 19.6 $\mu g/100\ cm^2$ (Weston, 1990). Table 3 summarizes Weston's sampling efforts. PRC could not determine the exact sample locations of the Weston TAT samples, but PRC observed dark streaks on the walls of the Cooper's Pit.

4.4.4 Pipelines West of the Cooper's Pit

PRC observed a pool of resin about 10 square feet in area and several inches deep on the soil west of the Cooper's Pit. The resin had flowed from pipelines running through a raised raceway on the west side of Building 7-C. Streams of resin were hanging from the bottom of the raceway, and the resulting resin pools completely obscured the soil. When PRC applied pressure to the hardened skin, yellow material oozed out from beneath it. Past samples taken from this area indicate that the soils beneath the resin have been contaminated with non-chlorinated solvents, including acetone, benzene, 2-butanone, ethylbenzene, 2-hexanone, toluene, and xylenes (RERC, 1990a; Weston, 1990) (see Tables 3 and 4).

4.5 PCB CONTAMINATION

PRC observed puddles of oil in many of the buildings at the facility. Additionally, various rooms contained electrical equipment. Based on previous investigations at the facility, any area containing oil may also contain PCBs. Nine areas containing oil or oily substances observed during the VSI or addressed in documents generated during site activities are discussed in this section, with the exception of the Cooper's Pit, which is discussed separately in subsection 4.4.3.

Areas of PCB contamination constitute an AOC because PRC could not determine the extent of this contamination. PRC observed that unauthorized persons gain access to the facility, and those persons may come into contact with the contaminated areas.

4.5.1 Building 3-B

During the VSI, the floor of Building 3-B was covered with sludge and liquids. Because of these conditions, PRC did not venture all the way into the building, which was formerly used as a resin and oil storage area (IT, 1990b). PRC did not notice anything that would have indicated the presence of electrical oils, fuel oils, or oils containing PCBs during the VSI, but sampling conducted by the Weston TAT in September 1990 indicated their presence. A wipe sample indicated levels of Aroclor 1260 at 103,000 $\mu g/100\ cm^2$. A sludge sample indicated levels of Aroclor 1248 at 2,770 ppm and Aroclor 1260 at 448,000 ppm (Weston, 1990). A summary of Weston's sampling activities is provided in Table 3.

4.5.2 Building 3-F

PRC observed what appeared to be electrical equipment, including at least one transformer, in Building 3-F. The floor in this building was sticky, and pools of oil were visible around some of the equipment. PRC also observed an overturned bucket. The bucket's contents had spilled onto the concrete floor and formed a small pool around the bucket. The spilled substance was dark in color and appeared to be oil. Past sampling efforts by RERC in December 1989 have indicated that PCBs are present in concentrations as high as 4,413,000 $\mu g/100\ cm^2$ (RERC, 1990a). A summary of RERC's sampling efforts is presented in Table 4. RERC noted in its January 1990 Environmental Assessment of the facility that the PCB wipe samples were collected in a Building 3 electrical room (RERC, 1990a). The only electrical room that PRC observed in the Building 3 complex is located in Building 3-F, and PRC believes that RERC may have collected its PCB wipe samples in Building 3-F.

4.5.3 First Floor of Building 8

PRC observed two electrical engines on the first floor of Building 8, in a generator room located in the northern portion of the building. PRC believes that fuel oil was probably used as a fuel source for these engines. However, because sampling efforts conducted around other electrical equipment in the facility have revealed the presence of PCBs (RERC, 1990a; Weston, 1990), PRC believes that PCB-containing oil may have been used in conjunction with these engines (see Tables 3 and 4). PRC observed oily liquids in trenches beneath each of the engines.

4.5.4 Building 9

PRC observed an electrical engine in Building 9, which appears to have been a generator building. PRC believes that fuel oil was probably used as a fuel source for this engine. PRC observed oily liquids in a trench beneath the engine. The floor in this room was sticky in areas. Sludge samples were taken from this room by the Weston TAT in September 1990. Sample analyses results indicated that the sludge contained up to 6.67 ppm PCBs (Aroclor 1254) (Weston, 1990). A summary of Weston's sampling efforts is provided in Table 3. A floor wipe sample was collected by RERC in December 1989. Sample analyses results indicated a PCB concentration of 12,917 $\mu g/100\ cm^2$ in the sample area. RERC's sampling efforts are summarized in Table 4. Based on sample results, PCB contamination is present in this building.

4.5.5 Building 9-C

PRC observed several boilers in this building, which appears to have been a boiler room during plant operations. The floor of the room was heavily covered with debris, and PRC observed several pools of black, oily substances. The pools were located throughout the room. Because of safety concerns, PRC did not attempt to enter small corners and walkways in this room. Because this building contains electrical equipment, and because past sampling efforts at the facility have indicated the presence of PCBs near electrical equipment, PRC believes that the pools of oil, the walls, and the machinery in this building may be contaminated with PCBs.

4.5.6 First Floor of Building 10

PRC observed several oily stains on the first floor of Building 10. Valspar apparently used this area of the plant as a process area (IT, 1990b). Historical records of the facility do not indicate that electrical equipment was used in this building. However, PRC could not determine whether any electrical equipment may have been temporarily stored or used in this building. Because sampling efforts at the facility have revealed the presence of PCB-containing oils in other parts of the facility (see Tables 3 and 4), PRC believes that these oil stains may contain PCBs.

4.5.7 Basement of Building 12

A room containing electrical equipment is located at the west end of the Building 12 basement. PRC observed several inches of oily liquids and sludge on the floor of this room. PRC also observed three inoperational transformers and other abandoned electrical equipment in this room. Based on the presence of the transformers and other equipment, PRC believes that this room was used as an electrical room when the plant was operational. Samples taken by the Weston TAT in September 1990, indicate that liquids in the room contain PCBs as high as 3,300 ppm (Aroclor 1260). Analysis of a PCB wipe sample collected by the Weston TAT in this room showed levels of Aroclor 1260 as high as 61,800 $\mu g/100\ cm^2$ (Weston, 1990). A summary of Weston's sampling efforts is presented in Table 3. During an RERC sampling visit in December 1989, a PCB wipe sample was collected from the electrical room. Analyses indicate that levels of PCBs as high as 161,464 $\mu g/100\ cm^2$ are present in the room (RERC, 1990a). A summary RERC's sampling efforts is presented in Table 4. RERC identified the sample location as the electrical vault in Building 14, but PRC assumes that this is a typographical error and should be Building 12. PRC did not observe any rooms containing electrical equipment in the basement of Building 14, which is located adjacent to Building 12. Based on the sampling results, PCBs are present in the basement electrical room of Building 12.

4.5.8 Railroad Spur

PRC observed an electrical engine on the railroad spur east of Building 9. Based on the electrical engines currently present in Buildings 8 and 9, the engine may have been used inside one of these buildings at one time. Because PCBs have been detected in buildings containing electrical equipment at the facility (RERC, 1990a; Weston, 1990) (see Tables 3 and 4), PRC believes that this engine may be storing PCBs in oils remaining in the equipment.

4.6 ASBESTOS PIPING INSULATION

PRC observed many pipes insulated with various types of material during the VSI. Some insulation contained yellow fibers and appeared similar to fiberglass piping insulation available at most hardware stores. Other piping insulation contained white or cream-colored fibers. Analyses of piping insulation by RERC has indicated that amosite and chrysotile asbestos fibers are present in some of the facility's piping insulation at levels of 40 to 50 percent (RERC, 1990d). Analysis of piping insulation by Kinsey during site characterization activities in 1985, following the 4(q) Notice indicated that amosite fibers are present in some of the piping insulation at the facility at levels of 90 to 95 percent (Pace Laboratories, Inc., 1985). Piping insulation was observed in almost every building of the facility. Much of the insulation material is deteriorating and falling from ceiling pipes onto the floors of the buildings.

Areas containing asbestos piping insulation constitute an AOC because PRC could not determine the amount of this insulation at the facility. PRC observed that unauthorized persons gain access to the facility, and those persons may come into contact with the insulation, which is a hazardous material.

4.7 HEAVY METAL DUST AND PEELING PAINT

During the VSI, PRC observed rooms and buildings that have apparently remained undisturbed for some time. Dust had settled in almost every building PRC inspected. According to Valspar:

> During early years of operation, metallic pigments were stored in bags or fiber drums in various areas of the production buildings. They were loaded into pigment hoppers on the fourth or fifth floor of buildings 7 and 12. Aluminum and copper pigments were used in paste form. Lead, chromium, cadmium and titanium were used as powders. In 1982, the plant phased out of manufacturing metal based paints (IT, 1990b).

Past removal actions included vacuuming large areas containing dust on floors one through six of Buildings 7, 8, and 12. In 1987, Kinsey noted that vandalism at the facility had exposed some dust thought to contain lead (Kinsey, 1987). PRC believes that ongoing vandalism is occurring at the facility and that this vandalism may be exposing more lead dust.

PRC observed at least two dust collectors during the VSI. These units were probably used to collect heavy metal pigments that became airborne during mixing operations and may currently contain heavy metal dust.

PRC observed peeling paint in nearly every building at the facility. Because of concern about the presence of lead in this paint, RERC sampled peeling paint chips during its December 1989 sampling visit. Sample analyses indicated levels of total lead as high as 230 ppm and EP Toxic lead as high as 0.3 mg/L (RERC, 1990a). A summary of RERC's sampling efforts is presented in Table 4.

Areas containing heavy metal dust or peeling paint constitute an AOC because PRC could not determine the amount of dust and peeling paint at the facility. Lead pigments were used at the facility when it was operating, and the peeling paint contains lead. PRC observed that unauthorized persons gain access to the facility, and those persons may come into contact with the dust and peeling paint.

4.8 ALLEGED LEAD SMELTING OPERATIONS

Before and during the VSI, Goodwill stated that lead smelting operations may have occurred at the facility prior to the time Valspar used it (Bell, Boyd & Lloyd, 1991a). Because lead compounds have been extensively used as pigments in the paint industry, PRC believes that a lead compound conversion system may have been used at the facility. During and after the VSI, PRC explored the possibilities that past operators at the facility may have smelted lead or used a lead compound conversion process.

Because lead smelting or lead compound conversion requires a source of heat, Building 3 is the only area that PRC believes may have been used to smelt lead or convert lead compounds. PRC observed three kettles in the varnish cooking area in this building. A heat source would have been located below the varnish kettles in order to cook the varnish, and this heat source could have possibly been used to smelt lead or to alter the chemical characteristics of lead compounds.

During the VSI, Valspar stated that it did not use Building 3 to cook varnish during the time it used the facility buildings. PRC believes that Valspar did not use the building to smelt lead or convert lead compound pigments, either. PRC did not note any other buildings that would likely have been used to heat materials.

After the VSI, PRC obtained maps of the facility created by Armstrong Paint between 1944 and 1967. According to these maps, a "lead plant" is located at the south end of the Armstrong Paint facility (Armstrong Paint, 1966). The buildings called "the lead plant" are located south and east of the South Tank Farm at the facility and are located on Armstrong Containers property. Based on the name of the building, PRC believes that lead smelting, grinding, or other lead operations were required at the facility when Armstrong Paint used the facility property. Prior to the addition of "the lead plant," these operations may have occurred elsewhere at the facility.

Based on the known, past cooking operations in Building 3, and based on the potential that lead operations may have been required before the addition of the "lead plant," Building 3 may have been used to smelt lead or to convert lead compounds in paint pigments.

Building 3 is considered an AOC because of the nature of the activities that may have occurred there. Lead contamination throughout the building may be encountered. PRC observed that unauthorized persons have gained access to the facility, and these persons may come into contact with any lead contamination in the building.

4.9 UNKNOWN, POTENTIAL HAZARDS

PRC did not view several areas of the facility because of perceived hazards or because PRC was not aware of and did not locate the entrances to those areas. Additionally, PRC was not able to identify potential hazards in several areas because of facility conditions. PRC did not perform any intrusive activity or enter any confined spaces, as required by the site-specific health and safety plan.

4.9.1 Areas Not Viewed During the VSI

During the VSI, PRC did not view many of the piping raceways and pipelines because of their inaccessibility. Many of the pipelines were located aboveground along high walls and ceilings. The sheer volume of pipelines at the facility precluded an in-depth inventory during the time allotted for the VSI.

PRC did not view all the stairways at the facility. PRC used stairs to move from one floor to another, and in many cases, several stairways led into each floor of each multi-story building. PRC feels that the stairwells that it did view are probably representative of conditions at other stairways in the building.

Portions of the facility complex have burned to the ground and are covered with rubble. The former resin production buildings and other buildings located at the western side of the facility in Buildings 3-A, 3-C, 3-D, 3-E, 4, 4-A, 4-B, 4-C, 17, 17-A, and 22 were completely covered with fill material during the VSI.

Portions of Buildings 13, 13-A, 13-B, 14, and 14-A were damaged during a fire in the summer of 1990. Goodwill recommended that PRC not walk out over the floor area in several areas of the burned buildings for safety reasons. Although some of the building floors remain, PRC did not conduct a full investigation of the accessible floors.

PRC did not locate entrances to the second floor of Building 3-F, the basement of Building 7, or the second floor of Building 10. PRC did not observe any accessways or fill pipes to the underground fuel storage tanks that reportedly exist in Building 9-C (IT, 1990b).

These areas may be AOCs because although PRC did not observe them, the nature of the operations observed at all other locations suggests similar conditions probably exist. These areas are of concern because of what is not known.

4.9.2 Areas Not Fully Characterized During the VSI

During the VSI, PRC observed trenches, pits, sumps, and drains in several buildings. PRC was generally unable to locate piping leading into or out of these areas. Additionally, many pits, and even entire rooms, were filled with liquids of unknown depth. For safety reasons, PRC did not attempt to disturb the liquids in order to determine the depth to the bottom of the pits or buildings. In many cases, PRC was unable to determine the integrity of the trenches, pits, sumps, drains, and floors, because they contained liquid, rubble, or other unknown substances.

These areas constitute AOCs because they represent potentially hazardous and unknown conditions at the facility.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified many SWMUs and AOCs at the 1330 South Kilbourn Street facility. Background information on the facility's location, operational areas, operations, regulatory history, characterization activities, environmental setting, and receptors is presented in Section 2.0. SWMUs are discussed in Section 3.0. AOCs identified at the facility are discussed in Section 4.0. Following are PRC's conclusions and recommendations for the facility. Because PRC's recommendations are quite broad due to the nature of the facility, specific SWMUs and AOCs are not broken down into single entities in the following discussion. Rather, the characteristics of each type of SWMU and similar AOCs are grouped and summarized to the extent possible given the limited information PRC was able to gather.

PRC recommends that a RCRA Facility Investigation (RFI) be performed immediately. During the RFI, all materials at the facility should be characterized. A corrective action plan (CAP) for the facility should be devised. Corrective action may be required for the following SWMUs and AOCs.

5.1 SOLID WASTE MANAGEMENT UNITS

PRC identified two general categories for SWMUs. These are: (1) hazardous waste storage units (HWSU) consisting of any units Valspar identified in its RCRA Part A permit application or closed under RCRA in 1985 (Valspar, 1980c; Rapps, 1985), and (2) unidentified units including tanks, process vessels, drums, or other storage or management units that PRC believes may be SWMUs, because material has been abandoned at the facility for more than 6 years.

5.1.1 Hazardous Waste Storage Units

Conclusions: PRC attempted to locate former HWSUs at the facility during and after the VSI. Valspar provided little information about facility activities during its operational period, claiming that it could not locate anyone that had worked at the facility. Based on conversations with Dan Flynn, the Rapps engineer that certified the facility's closure, PRC does not believe that the RCRA HWSUs identified in the facility's RCRA Part A permit application have been properly closed. Two drum storage areas not closed by Mr. Flynn are identified on Valspar's RCRA Part A permit application (Valspar, 1980c). An additional drum storage area is identified on a facility map given to PRC by Valspar and provided as an attachment to Valspar's Settlement Proposal (IT, 1990). This additional drum storage area and a tank storage unit identified on Valspar's RCRA Part A permit application were the only HWSUs certified closed by Mr. Flynn (Rapps, 1985).

Recommendations: EPA should request that Valspar explain why the HWSU map provided in Valspar's RCRA Part A permit application and the map provided in the Settlement Proposal (IT, 1990b) are in conflict. Valspar should be requested to identify and locate all HWSUs noted in its RCRA Part A permit application or used in conflict with its RCRA Part A permit application. Valspar should provide certification of closure or proof of non-use as anything other than a less than 90-day storage area. EPA should also request that Valspar explain why its consulting engineer was not present during closure activities and why the consulting engineer was not shown all HWSUs identified on Valspar's RCRA Part A permit application during closure certification activities. EPA should request to review manifests generated when Valspar shipped wastes stored in its drum storage area(s) and hazardous waste storage tanks to off site disposal companies. The HWSUs should be investigated in a RFI.

5.1.2 Unidentified Units

Conclusions: PRC observed many tanks, process vessels, drums, and other storage or management units that may have been considered SWMUs during the period that Valspar or previous operators used the facility. These units consist of dust removal systems, caustic tank cleaning systems, and as yet unobserved tanks. Additionally, IEPA views the storage and management of abandoned, hazardous materials for periods greater than 90 days as justification to consider the materials hazardous waste. Because of PRC's uncertainty regarding the actual use and contents of many units, the unidentified units are defined for the purpose of this report as AOCs. The conclusions and recommendation for the AOCs at the facility are described below.

Recommendations: As SWMUs are identified during further actions at the facility, EPA should require the current owners and past operators of the facility to close those SWMUs accordingly.

5.2 AREAS OF CONCERN

Although many of the AOCs may meet the definition of a SWMU, they are mentioned in this section because of PRC's uncertainty regarding the actual use and contents of many units. PRC observed evidence of trespassing during the VSI. PRC suspects that unauthorized persons reside in buildings located at the facility. Therefore, the public is considered to have a high potential for contact with materials located at the facility. It is also possible that the facility may be used as a waste disposal area by trespassers. For these reasons, PRC recommends that the facility be secured and guarded immediately.

PRC identified eight general categories for AOCs: (1) containers, (2) tanks, (3) piping raceways, (4) spill areas located outside the facility, (5) PCB contamination, (6) asbestos piping insulation, (7) heavy metal dust and peeling paint, and (8) alleged lead smelting operations.

5.2.1 Containers

Conclusions: PRC identified a total of 37 drums, barrels, and pails that contained liquid, semisolid, solid, and unknown contents. PRC identified at least 15 pails on the stairwells that contained powder. PRC did not inspect all stairwells at the facility, so more pails of the powder may be present at the facility. Eight of the 37 containers were found to contain VOCs, based on PID readings. PRC could not check 15 of the 35 containers with the PID, because PRC could not access their headspaces. Table 5 summarizes the locations and contents of the containers PRC identified during the VSI.

Recommendations: As part of a RFI, the owner should sample all containers remaining at the facility to determine whether their contents contain hazardous substances or constituents. If the contents of any containers are considered to be hazardous or to contain hazardous constituents, the containers should be disposed of in an appropriate fashion.

5.2.2 Tanks

Conclusions: Based on the VSI and past facility characterizations (Waste Reduction, 1985; IT, 1990b), PRC believes over 300 tanks currently exist at the facility. PRC observed underground storage tanks; aboveground, indoor storage tanks; and aboveground, outdoor storage tanks. Tanks in each category may contain hazardous substances or constituents. PRC was unable to locate several tanks that are alleged to exist at the facility. PRC observed that some of the tanks have been cut open and drained (see Attachment G). Other tanks that could be observed appeared to be mostly empty with thin coatings of sludges, paints, or liquids present in them. Still other tanks appeared to be full or partially full. Several tanks may be leaking through faulty piping. The integrity of most of the underground storage tanks is unknown. IEPA has indicated that these tanks may be slowly filling with ground water (IEPA, 1987b). Because all tanks have been abandoned, are not regularly inspected, and vandals have removed tank valves, the tanks may be slowly releasing their contents to the environment. Since the tanks have been abandoned, their contents may also be considered as waste material, and any hazardous material in the tanks may be considered hazardous wastes.

Recommendations: As part of a RFI, the owner should perform a full inventory of all tanks at the facility. The owner should characterize the contents of any materials contained in the tanks and determine the integrity of the tanks. Finally, the owner should characterize any releases that may have occurred from tanks at the facility.

5.2.3 Piping Raceways

Conclusions: PRC observed an unidentified number of piping raceways and pipelines throughout the facility. Many of the piping raceways are located underground, and many pipelines are located in inaccessible areas. As a result, few piping raceways and pipelines were inventoried during the VSI. A number of the pipes in the raceways and pipelines were leaking during the VSI, and PRC observed stained soil and stressed vegetation beneath a number of outdoor pipelines. According to Valspar, the pipelines were drained in 1984, when Valspar vacated the facility. However, PRC suspects that some of the pipelines have still not been cut and drained because PRC observed leaks from several pipelines at the facility. Several underground raceways appeared to leave the facility heading in the general direction of Armstrong Containers, and during the VSI, Goodwill alleged that Valspar and Armstrong Containers shared several tanks at the facility. Valspar denied that allegation at the time it was made.

Recommendations: As part of a RFI, the owner should perform a full inventory of piping raceways located at the facility. During the inventory, the owner should characterize any materials still contained in the pipes. The owner should characterize any releases that have occurred from pipes.

5.2.4 Outdoor Spill Areas

Conclusions: PRC observed outdoor spill areas during the VSI. Sampling by the Weston TAT and by RERC have indicated that lead contamination is present in facility soils. Other facility soils are contaminated with solvents, including 2-butanone, toluene, ethylbenzene, benzene, and xylenes. PRC believes that additional soil areas, particularly on the railroad spur outside of Building 9, may contain oils and potentially PCBs.

Recommendations: As part of a RFI, the owner should conduct an extensive soil and soil gas survey at the facility. During the VSI, PRC noted that a number of spills were clearly visible on the facility property, and PRC believes that a number of other spill areas may exist based on stressed vegetation in several locations. The owner should investigate soils and soil gas beneath the concrete pad east of Building 25, along the railroad spur, and west of the Cooper's Pit.

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5.2.5 PCB Contamination

Conclusions: PRC observed puddles of oil and electrical equipment in several buildings at the facility. Based on past sampling results by the Weston TAT and by RERC, PRC believes that much of the oil viewed at the facility may contain PCBs. Samples taken by these entities indicate that levels of PCBs may reach 50 percent in some sludges located on the ground in the electrical rooms. Wipe samples collected from walls and floors of various buildings also indicate elevated levels of PCBs.

Recommendations: Under the appropriate authority, EPA should require the owner to immediately conduct an extensive PCB survey throughout any areas of the facility where oil staining or electrical equipment is evident. Specifically, the owner should conduct sampling activities in Building 3-B, Building 3-F, Building 8, Building 9, Building 9-C, Building 10, and Building 12. The survey should also include wipe samples taken randomly throughout the facility using approved statistical methodology in order to pinpoint any unknown areas of PCB contamination. The owner should request that Valspar provide information regarding its use of PCBs at the facility. Because of the known presence of PCBs at the facility, and because PRC believes that the general public can access the facility, the potential for public contact with PCBs is extremely high.

5.2.6 Asbestos Piping Insulation

Conclusions: PRC observed a large quantity of piping insulation during the VSI. Based on past analyses conducted by RERC, much of this insulation contains asbestos. Many buildings contained piping insulation in various stages of deterioration, and PRC noted that several bundles of piping insulation had fallen to the ground as a result of that deterioration.

Recommendations: Under the appropriate authority, EPA should require the owner to immediately remove all asbestos piping insulation from the facility. Because of the quantity and deteriorating condition of the piping insulation, because it likely contains asbestos, and because PRC believes that the general public can access the facility, the potential for public contact with the piping insulation is extremely high.

5.2.7 Heavy Metal Dust

Conclusions: PRC observed dust in many areas of the facility. PRC believes the dust may contain metals, because Valspar, and presumably any paint manufacturers using the facility prior to 1976, probably used metal pigments for a variety of paint products. Many pigments used in the paint industry in the past have contained various heavy metals at various concentrations.

Recommendations: The owner should sample the dust in the buildings at the facility to determine the nature and extent of any heavy metals contamination.

5.2.8 Alleged Lead Smelting Operations

Conclusions: PRC determined that at one point in time, Armstrong Paint used the facility buildings for paint production. Because of the large varnish cookers located in Building 3, and because Armstrong Containers has a "lead plant," PRC believes that one of the past users of the facility may have processed lead pigments.

Recommendations: The owner should collect wipe samples from various locations in Building 3, including the floor, walls, and ceiling of the building, to determine whether the surface concentrations of lead in Building 3 are elevated with respect to a background sample.

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Valspar, 1985. Closure, Post-Closure Plans, and Financial Requirements.

Valspar, 1991. Letter from William Stewart to Ken Valder, PRC, August 16.

Waste Reduction, 1985. Phase I Identified Response Action, October 23.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 081 040 107

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
1330 South Kilbourn Avenue Facility (Valspar Paint Plant)	1330 South Kilbourn Avenue

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Chicago	IL	60623	Cook		

09 COORDINATES: LATITUDE 41° 51' 50" N | LONGITUDE 87° 44' 10" W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

From the Eisenhower Expressway (Interstate 290), exit south on Kostner Avenue. Drive approximately 1/2 mile south to Roosevelt Road. Turn west on Roosevelt Road and drive approximately 1/4 mile to Kilbourn Avenue. Turn south on Kilbourn Avenue. The site is about 2 blocks down and to the west.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*
Goodwill Industries of Chicago & Cook County, Inc.	601 West Polk Street

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Chicago	IL	60607	(312) 939-0040

07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*
The Valspar Corporation (former)	1101 South Third Street, P.O. Box 1461

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Minneapolis	MN	55440	(612) 375-7973

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: ____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER ____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08/13/80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: __/__/__ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 07/23-24/91
☐ NO

BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: ____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)

02 SITE STATUS *(Check one)*

☐ A. ACTIVE ■ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

Unknown (BEGINNING YEAR) | 1984 (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Asbestos, polychlorinated biphenyls (PCB), lead, acetone, benzene, 2-butanone, ethylbenzene, 2-hexanone, toluene, xylene, other solvents

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Site soils are contaminated with lead, solvents, and possibly PCBs. The building is deteriorated. Paint chemicals, asbestos, lead, and PCBs have contaminated parts of the building structure. The general public can access the site. Residences are located adjacent to the site.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

■ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ☐ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Ken Valder		PRC	(312) 856-8700	07/24/91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 081 040 107

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ■ A. SOLID
- ■ B. POWDER, FINES
- ■ C. SLUDGE
- ■ D. OTHER Soils, structural components *(Specify)*
- ■ E. SLURRY
- ■ F. LIQUID
- ■ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON ______

CUBIC YARDS Unknown

NO. OF DRUMS Unknown

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ■ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ■ D. PERSISTENT
- ■ E. SOLUBLE
- ☐ F. INFECTIOUS
- ■ G. FLAMMABLE
- ■ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	Unknown		
OLW	OILY WASTE	Unknown		
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown		
IOC	INORGANIC CHEMICALS	Unknown		
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS	Unknown		

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
IOC	Asbestos	1332-21-4	Piping insulation	40 - 50	Percent
SLU, OLW	PCB (Aroclor 1248)	12672-29-6	Release	2,770	ppm
SLU, OLW	PCB (Aroclor 1254)	11097-69-1	Release	7 - 33	ppm
SLU, OLW	PCB (Aroclor 1260)	11096-82-5	Release	448,000	ppm
OLW	Total PCBs	1336-36-3	Release	4,413,000	µg/100 cm^2 (wipe)
MES	Lead	7439-92-1	Release to soil	690	ppm
MES	EP Toxic Lead	7439-92-1	Release to soil	0.8	mg/L
MES	Lead	7439-92-1	Peeling paint	230	ppm
MES	EP Toxic Lead	7439-92-1	Peeling paint	0.3	mg/L
SOL	Acetone	67-64-1	Release to soil	730	ppm
SOL	Benzene	71-43-2	Tar tank	0.77	ppm
SOL	2-Butanone	78-93-3	Release to soil	98	ppm
SOL	Ethylbenzene	100-41-4	Release to soil	190	ppm
SOL	2-Hexanone	591-78-6	Release to soil	17	ppm
SOL	Toluene	108-88-3	Release to soil	20	ppm
SOL	Xylene	1330-20-7	Release to soil	21,000	ppm

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

IEPA files; U.S. EPA files; RERC Environmental, Environmental Assessment of the Valspar Site, January 19, 1990; RERC Environmental, Inc., Letter to Goodwill, July 24, 1990; Roy F. Weston, Inc., Site Assessment Report for Valspar Paint Corporation, November 1990; Visual site inspection (VSI)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 081 040 107

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ■ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ______) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

Site soils are contaminated. There may be evidence that several underground storage tanks have released their contents. Shallow ground water is not used near the site.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ______) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ______ — 04 NARRATIVE DESCRIPTION

None

01 ■ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: ______) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

Asbestos-containing material has fallen to the floor in many of the site buildings and may become airborne. The contents of open or loosely covered drums and tanks may be volatilizing. Future building fires may cause PCBs to become airborne.

01 ■ D. FIRE/EXPLOSIVE CONDITIONS — 02 ■ OBSERVED (DATE: 8/19/90) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

A fire destroyed part of the plant in August 1990. Currently, open drums containing solvents pose a threat of fire and explosion.

01 ■ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: ______) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

Asbestos, PCBs, solvents, resins, latex, tars, and contaminated soil could all be contacted by persons gaining access to the site.

01 ■ F. CONTAMINATION OF SOIL — 02 ■ OBSERVED (DATE: 09/90) — ☐ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: 18.1 *(Acres)* — 04 NARRATIVE DESCRIPTION

Lead, acetone, 2-butanone, ethylbenzene, 2-hexanone, toluene, and xylene have been detected in site soils. PCB contamination may also exist.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: ______) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: ______ — 04 NARRATIVE DESCRIPTION

None

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ______) — ☐ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: ______ — 04 NARRATIVE DESCRIPTION

None

01 ■ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: ______) — ■ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

See Section E.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 081 040 107

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ■ J. DAMAGE TO FLORA — 02 ■ OBSERVED (DATE: 07/24/91) — ☐ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Stressed vegetation was observed in several areas of the facility.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: ________) — ☐ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

None

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: ________) — ☐ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ■ M. UNSTABLE CONTAINMENT OF WASTES — 02 ■ OBSERVED (DATE: 07/24/91) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: Unknown — 04 NARRATIVE DESCRIPTION

Drums containing unknown solvents were being stored open during the VSI.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: ________) — ☐ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION

None

01 ■ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: ______) — ■ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Surface water runoff from the site probably enters storm sewers. Known soil contamination may contribute to surface water runoff contamination.

01 ■ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ■ OBSERVED (DATE: 07/24/91) — ☐ POTENTIAL — ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Waste material not left on site by Valspar or Goodwill was observed during the VSI. Open drums of solvent found on site could not be identified and may have been illegally placed at the site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS
The site is not supplied with electricity, so the basement is dark. Open pits and oily areas exist in that part of the site.

III. TOTAL POPULATION POTENTIALLY AFFECTED: Unknown

IV. COMMENTS

The site is frequented by vagrants. Residences are located on property adjacent to the site.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

IEPA files; U.S. EPA files; Goodwill files; Valspar files; VSI

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

1330 S. Kilbourn Avenue
Chicago, Illinois 60623

ILD 081 040 107

Date:	July 23, 1991
Facility representatives:	Bill Chamberlain, City of Chicago Mike Quinn, legal counsel for The Valspar Corporation (Valspar) Jerry Scheiberle, Facilities Maintenance Manager, Goodwill Industries of Chicago and Cook County (Goodwill) Russ Selman, legal counsel for Goodwill Leo Stern, legal counsel for Valspar Bill Stewart, Regulatory Affairs Department, Valspar Jim Wadsworth, President, Goodwill
Inspection Team:	Carla Buriks, PRC Environmental Management, Inc. (PRC) Tim Oliver, PRC Ken Valder, PRC
Photographer:	Ken Valder, PRC
Weather Conditions:	Sunny, clear skies, 80°F, light breeze

Summary of Activities:

PRC arrived on site at 09:45 and met Mr. Scheiberle, who is Goodwill's security officer for this facility. The parties representing Valspar arrived at 10:00. Mr. Chamberlain arrived at 10:25. The parties representing Goodwill arrived at 10:40. After everyone was present, Goodwill requested that each person entering the facility sign a waiver stating that Goodwill would not be held liable in case of accidental injury or death. PRC explained the purpose of the VSI and answered questions about the planned method of inspection. PRC also stated that its inspectors would inspect the facility with Level D personal protective equipment (PPE), at a minimum. No other parties donned PPE. PRC used a photoionization detector (PID), an explosimeter, and an oxygen meter for protective reasons.

The facility tour began at 10:50. The one-story buildings on the southern end of the property were viewed first. PRC inspected the Building 1 and 2 complex; a shed outside the complex; Building 25; Buildings 15, 15-A, and 15-B; and Buildings 3, 3-B, and 3-F. The various parties accompanying PRC on the inspection did not all stay together, and as a result, many of PRC's questions were answered by Mr. Stewart (Valspar) and Mr. Scheiberle (Goodwill).

VISUAL SITE INSPECTION SUMMARY

1330 S. Kilbourn Avenue
Chicago, Illinois 60623

ILD 081 040 107

Date:	July 23, 1991
Summary of Activities: (Continued)	After the building inspections, PRC entered the bermed area surrounding the North Tank Farm and the South Tank Farm. No attending parties accompanied PRC during this part of the inspection. At 12:15, PRC met with the Goodwill and Valspar representatives in the West Lot area. PRC was informed that Mr. Chamberlain had left for the day, that Goodwill and Valspar would be leaving shortly, and that Mr. Scheiberle would direct us through the rest of the facility.

After the various parties had left, PRC inspected the former solvent storage tanks in the West Lot area. From the West Lot, PRC proceeded into the Cooper's Pit area, inspecting the first floor areas of Buildings 7, 7-B, and 7-C. PRC then took a short break.

At 13:10, PRC resumed the inspection. PRC entered the Buildings 1 and 2 complex to inspect the second floor. PRC then inspected the first floors of Buildings 6 and 6-A; Buildings 5-A, 5-B, 5-C, 5-D, and 5-E; Buildings 9, 9-A, and 9-C; the first floor of Building 8; the first floor of Buildings 10 and 10-A; the first floor of Building 11; the first floor of Building 12; the basement of Building 10; the basement of Building 11; the basement of Building 12; the basement of Building 13; and the basements of Buildings 14 and 14-A.

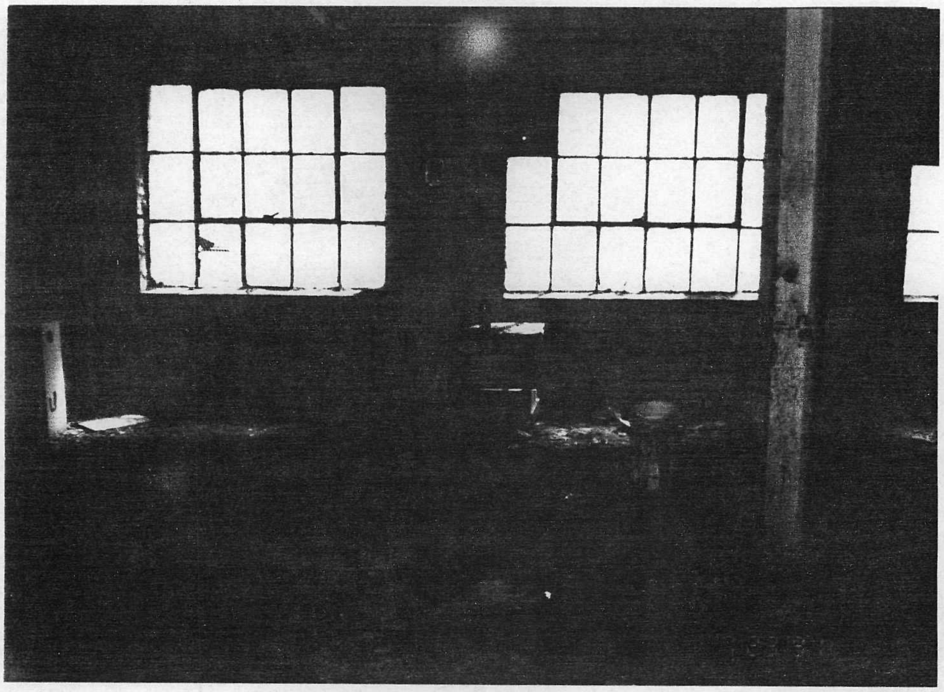
PRC arranged to return to the facility on the following morning with Mr. Scheiberle. PRC left the facility at 15:15.

VISUAL SITE INSPECTION SUMMARY

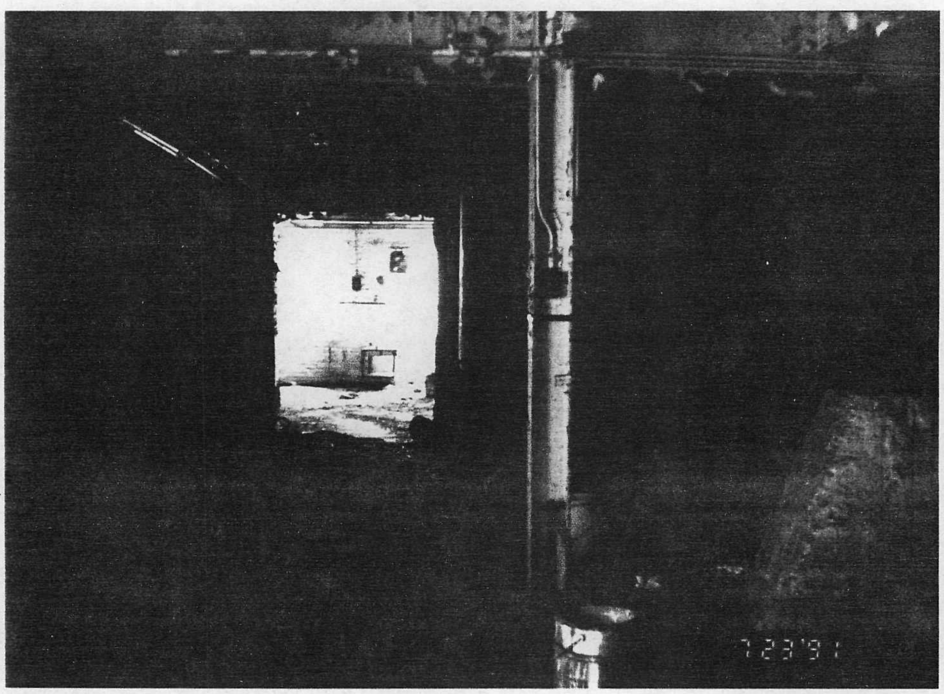
1330 S. Kilbourn Avenue
Chicago, Illinois 60623

ILD 081 040 107

Date:	July 24, 1991
Facility Representative:	Jerry Scheiberle, Goodwill
Inspection Team:	Carla Buriks, PRC Tim Oliver, PRC Ken Valder, PRC
Photographer:	Ken Valder, PRC
Weather Conditions:	Mostly sunny, clear skies with high clouds, 80°F, light westerly winds
Summary of Activities:	PRC arrived on site at 08:55 and met Mr. Scheiberle. PRC donned Level D PPE and carried a PID, explosimeter, and oxygen meter into the facility. PRC entered the facility and began the second day of the inspection at 09:15. Mr. Scheiberle escorted PRC throughout the rest of the facility. PRC observed the second floor of Buildings 12 and 13; the third floor of Buildings 7, 8, 12, and 13; the fourth floor of Buildings 7, 8, and 12; the fifth floor of Buildings 7, 8, and 12; the sixth floor of Building 12; the penthouse above Building 12; the seventh floor of Buildings 7 and 8; the 6th floor of Buildings 7 and 8; and the second floor of Buildings 7 and 8. PRC removed its PPE and left the facility at 10:50.

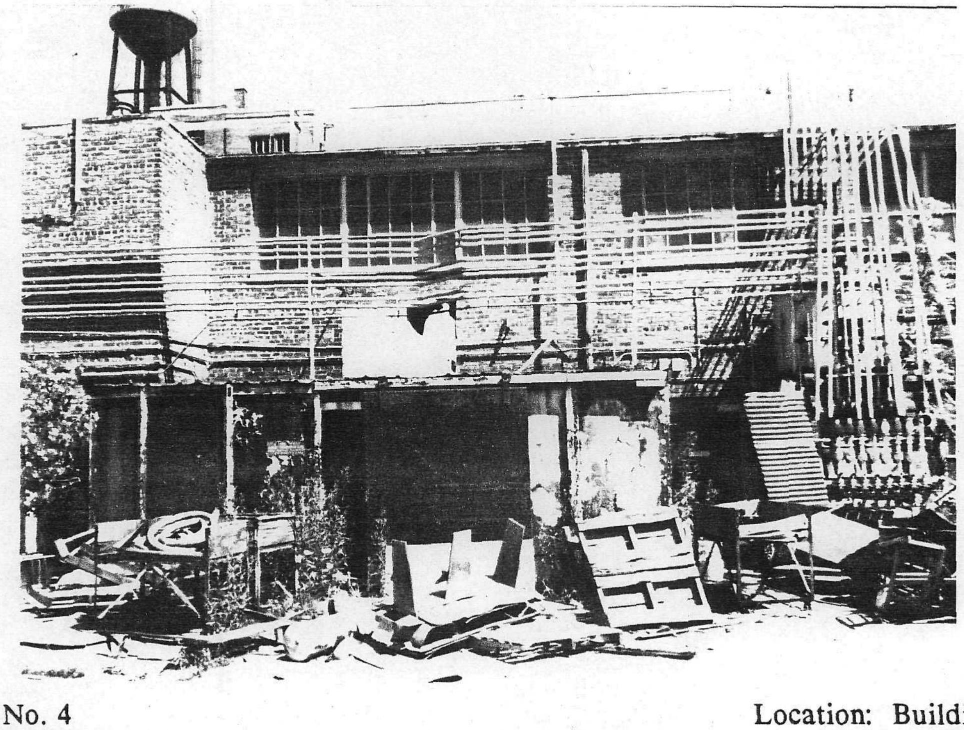


Photograph No. 1 Location: Buildings 1 and 2
Orientation: East Date: 07/23/91
Description: This picture shows the east room of the complex containing Buildings 1 and 2. The buckets seen on the right side of the picture are empty. Note the soda bottle and the magazine on the ground in the background. These may be signs that vagrants have used this room in the past.

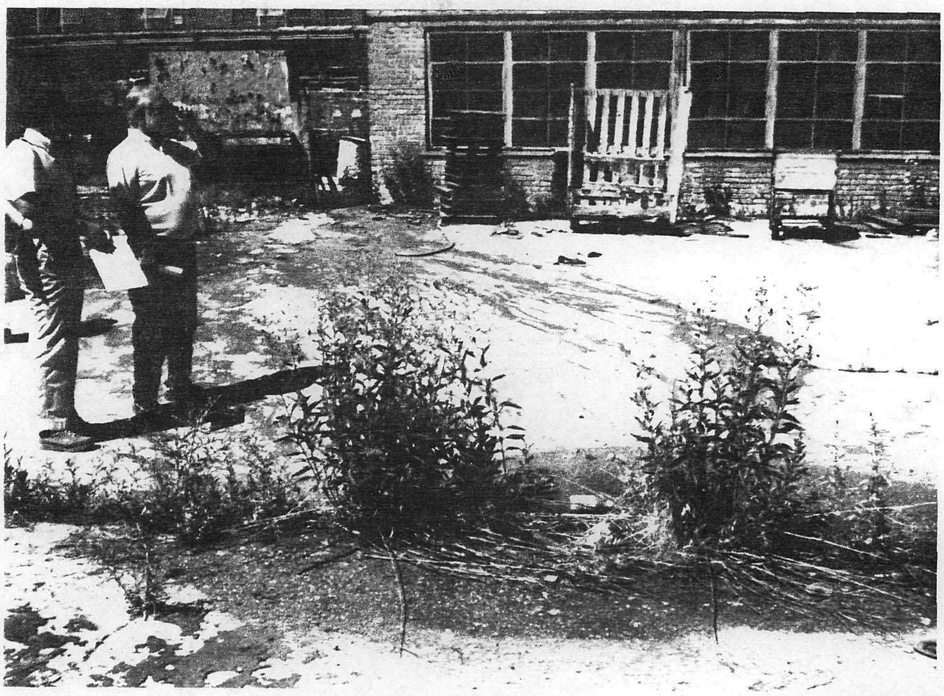


Photograph No. 2 Location: Buildings 1 and 2
Orientation: East Date: 07/23/91
Description: This picture shows the middle room of the complex consisting of Buildings 1 and 2. Two empty tanks are visible in the right background and behind the column in the center of the picture.

Photograph No. 3 Location: Shed South of Buildings 1 and 2
Orientation: East Date: 07/23/91
Description: This picture shows the interior of the brick shed located to the south of the complex consisting of Buildings 1 and 2. Empty cans and miscellaneous scrap metal make up the jumble of trash.

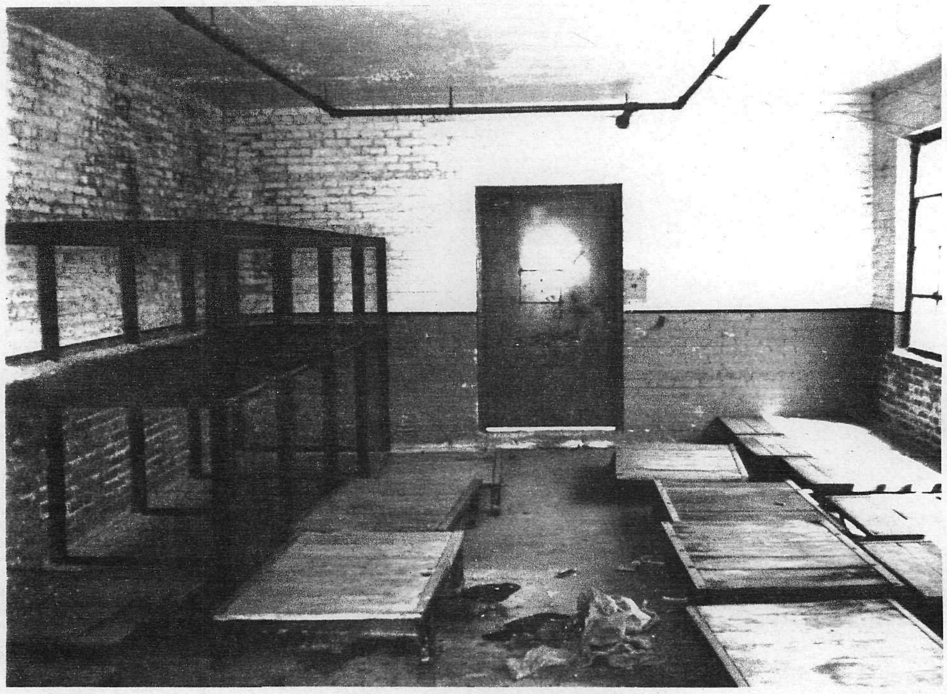


Photograph No. 4 Location: Buildings 1 and 2
Orientation: North Date: 07/23/91
Description: This picture shows the metal shed south of Buildings 1 and 2. Buildings 1 and 2 are located immediately behind the shed. Note the process lines running along the top of the buildings and the shed. The lines have been cut and drained at the right side of the picture.

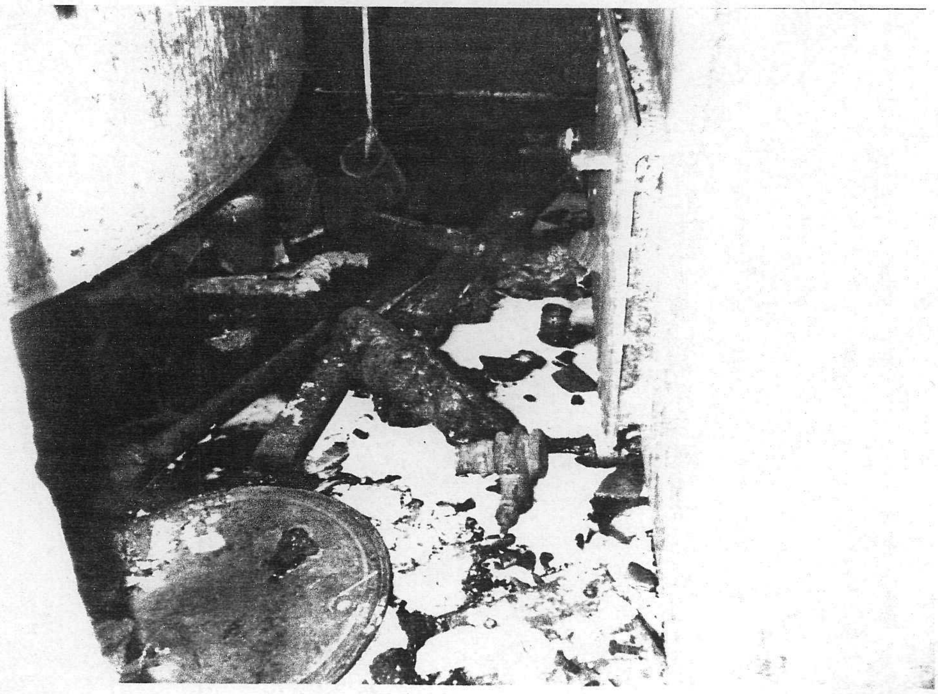


Photograph No. 5 Location: Outside Building 25
Orientation: West Date: 07/23/91
Description: This picture shows the paved area located east of Building 25 and south of Buildings 1 and 2. Several past paint spills can be seen in the picture, and the spill path leads to a drain located in the bushes in the foreground. Neither Goodwill nor Valspar representatives knew where the drain's outfall is located.

Photograph No. 6 Location: South of Building 25
Orientation: North Date: 07/23/91
Description: This picture shows two badly deteriorated cardboard drums oozing a thick, milky substance onto the asphalt lot south of Building 25. The substance was identified as latex by Valspar representatives.



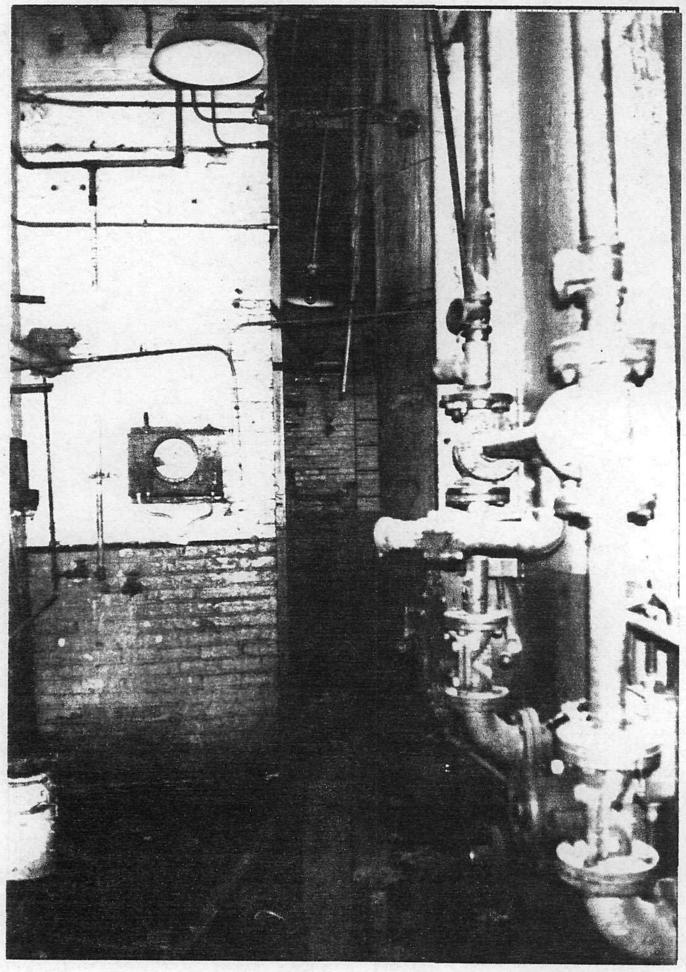
Photograph No. 7 Location: Building 25
Orientation: North Date: 07/23/91
Description: This picture shows the interior of Building 25. Because of the presence of the racks and pallets in this room, Valspar representatives stated that it may have been a container storage room.



Photograph No. 8 Location: Building 15-B
Orientation: North Date: 07/23/91
Description: This picture shows a portion of the floor in Building 15-B. The bases of two large tanks are visible in the left background and right foreground. The white substance on the floor is probably latex. Note the amount of scrap on the floor.

Photograph No. 9
Location: Building 15-B
Orientation: West
Date: 07/23/91
Description:

This picture shows the railroad tracks running along the west side of Building 15-B. Building 3-B is located across the tracks. Note the debris on the ground.



Photograph No.: 10
Location: Building 15-B
Orientation: East
Date: 07/23/91
Description:

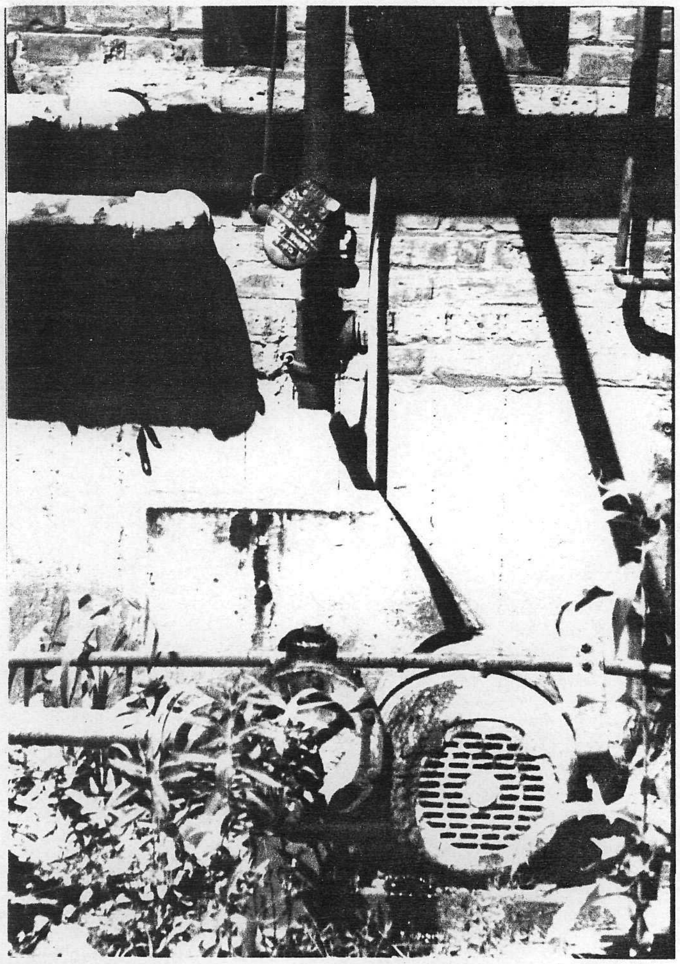
This picture shows the general layout of Building 15-B. Tanks 235 through 239 are located in this building along the south wall. Valspar representatives stated that these tanks were resin tanks during the facility's period of operation.

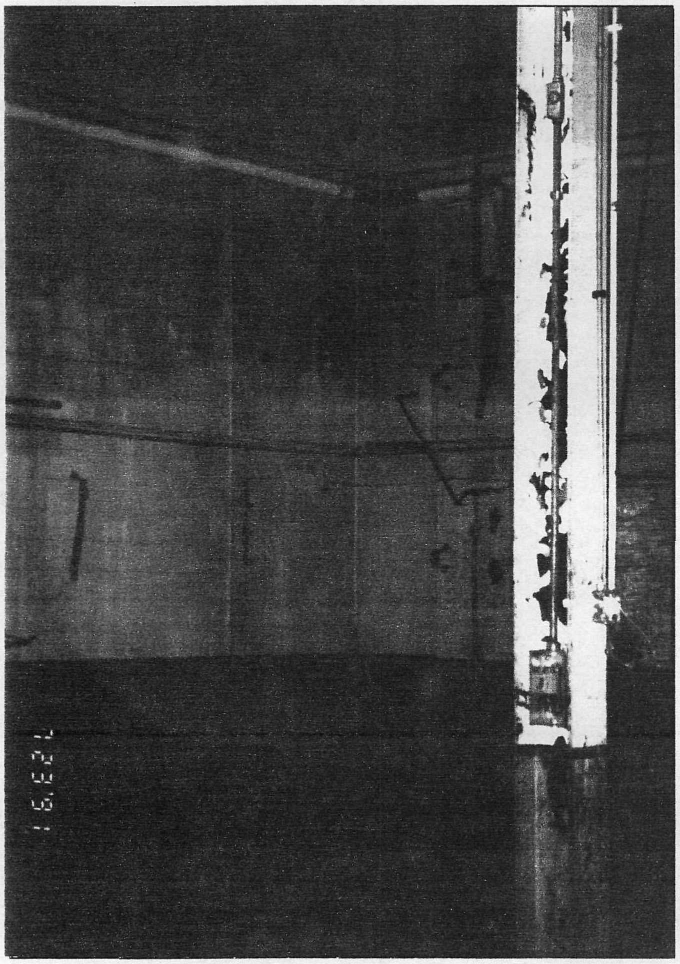
Photograph No. 11 Location: Building 15-B
Orientation: East Date: 07/23/91
Description: This picture shows the floor of the east portion of Building 15-B. Note that light- and dark-colored, resinous substances have been released to the floor. The object in the right foreground is a tank.

Photograph No. 12 Location: West of Building 3-B
Orientation: South Date: 07/23/91
Description: This picture shows three manholes leading into pipe raceways between the facility and the neighboring facility. Valspar representatives stated during the VSI that all pipes between the two facilities had been cut many years ago and that the pipelines in these raceways were not operational.

Photograph No. 13
Location: West of Building 3-B
Orientation: West
Date: 07/23/91
Description:

This picture shows a cut pipe that is dripping a substance onto the ground beneath it. The leak is a very dark, oily substance. Neither Valspar nor Goodwill identified the substance.



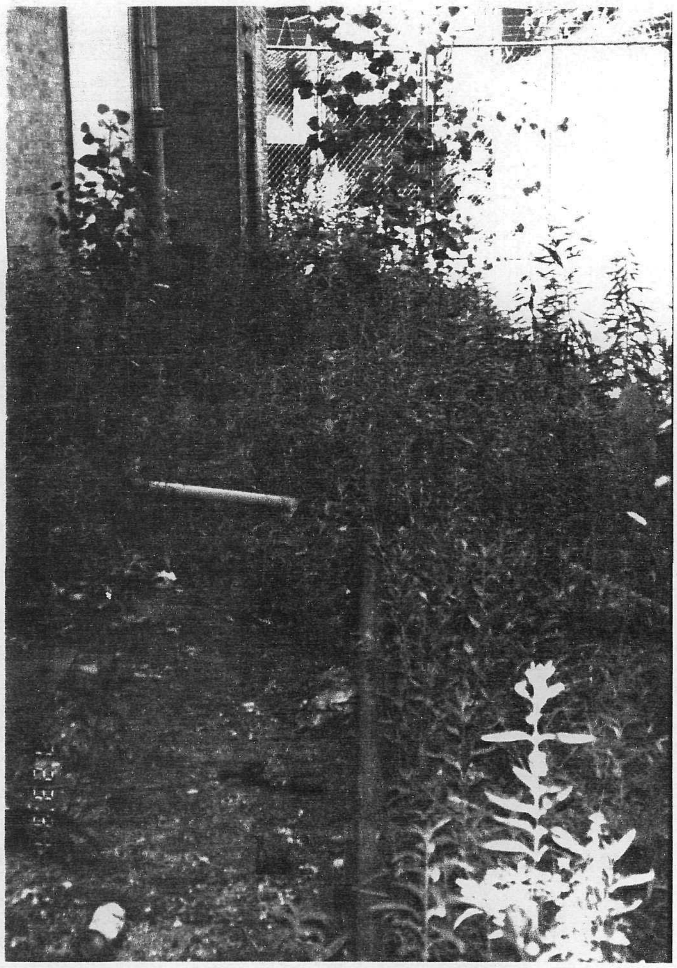


Photograph No. 14
Location: Building 15-A
Orientation: Southeast
Date: 07/23/91
Description:

This picture shows an overall view of Building 15-A. The room is currently empty except for miscellaneous trash on the floor.

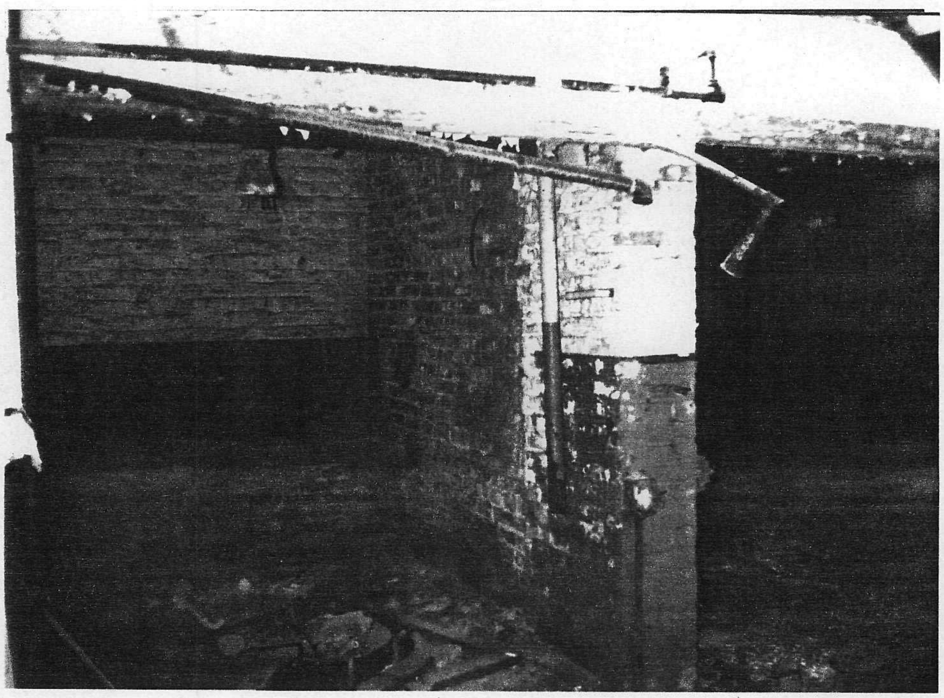
Photograph No. 15
Location: West of Building 15
Orientation: South
Date: 07/23/91
Description:

This picture shows a portion of the railroad tracks running along the west side of Building 15. Note the absence of vegetation on the left side of the picture. Also note the light-colored pipe near the middle of the picture. Its insulation may be asbestos.

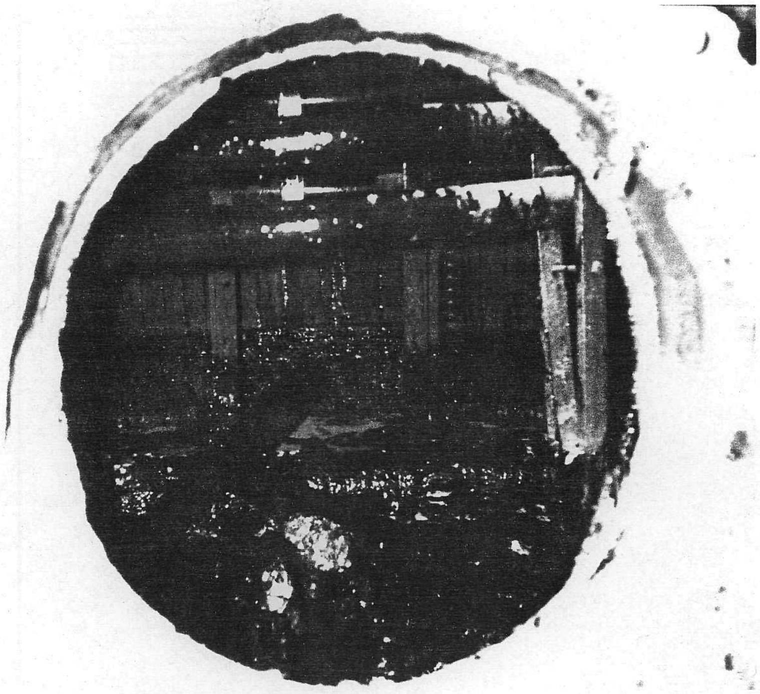


Photograph No. 16
Location: Building 15
Orientation: East
Date: 07/23/91
Description: This picture shows a sunken tunnel beneath Building 15. PRC observed damp areas in the tunnel. An area near the red sign at the right was once used to collect oily rags.

Photograph No. 17 Location: Building 15
Orientation: East Date: 07/23/91
Description: This picture shows a closeup of the floor in the hallway beneath Building 15 (see Photograph No. 16). Note the crumbled piping insulation on the left side of the picture. This insulation may contain asbestos.



Photograph No. 18 Location: Building 15
Orientation: Southwest Date: 07/23/91
Description: This picture shows the first floor of Building 15. This area was once used to cook varnish, presumably in large kettles. The fires would have been stoked beneath the round areas visible on the left and right sides of the picture. Note the piping insulation in the left background. It may contain asbestos.



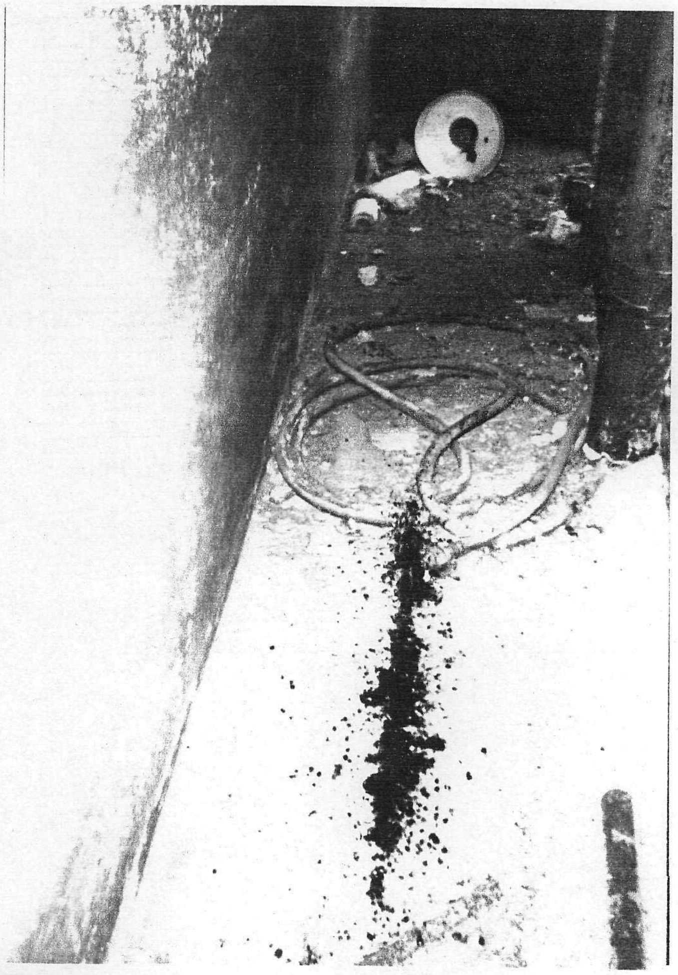
Photograph No. 19 Location: Building 3
Orientation: East Date: 07/23/91
Description: This picture shows the inside of Tank 214. The picture was taken through an access opening at the base of the tank. Valspar representatives stated that the material inside this tank is varnish.

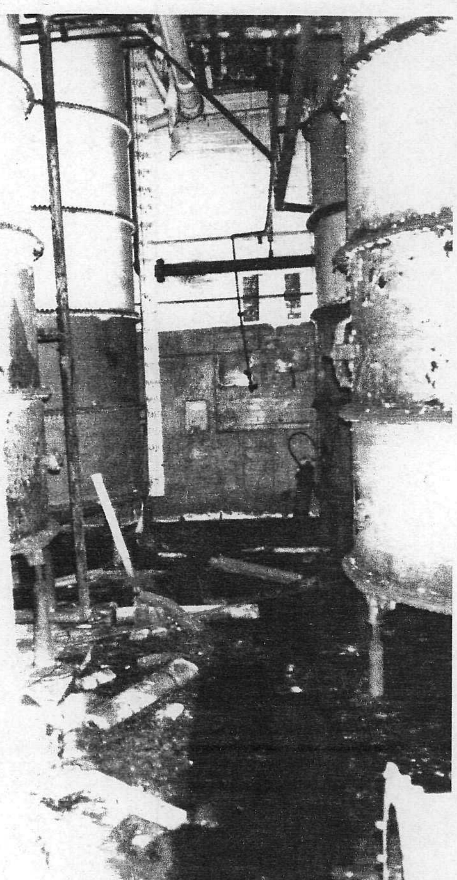
Photograph No. 20
Location: Building 3
Orientation: North
Date: 07/23/91
Description:

This picture shows a trench in Building 3. The wall on the left is actually the wall of a tank. Another tank is located in the background. Note the debris on the floor and the peeling paint on the tanks.

Photograph No. 21
Location: Building 3
Orientation: South
Date: 07/23/91
Description:

This picture shows a dark substance that has dripped onto the floor along the west wall of Building 3. Note the piping insulation in the background. It may contain asbestos.



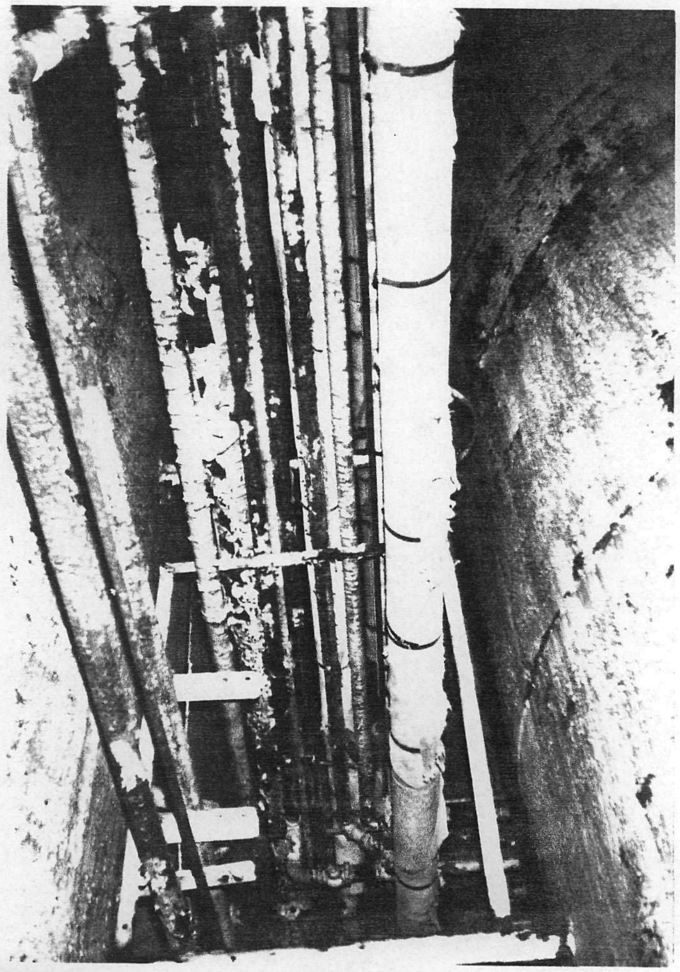


Photograph No. 22
Location: Building 3-B
Orientation: South
Date: 07/23/91
Description:

This picture shows the floor of Building 3-B. Note that the trenches beneath the tanks are full of liquid. Note the piping insulation strewn about the room. It may contain asbestos.

Photograph No. 23
Location: Building 3-B
Orientation: North
Date: 07/23/91
Description:

This picture shows the piping running between the tanks in Building 3-B. It is between 10 and 15 feet above the building floor. Note the piping insulation on two of the pipes. It may contain asbestos.



Photograph No. 24
Location: Building 3-B
Orientation: North
Date: 07/23/91
Description: This picture shows the floor in Building 3-B. The picture was taken from the same location as Photograph No. 23. Note the standing liquid on the floor, the deteriorated condition of the grates, the trench, and the piping insulation, which may contain asbestos.

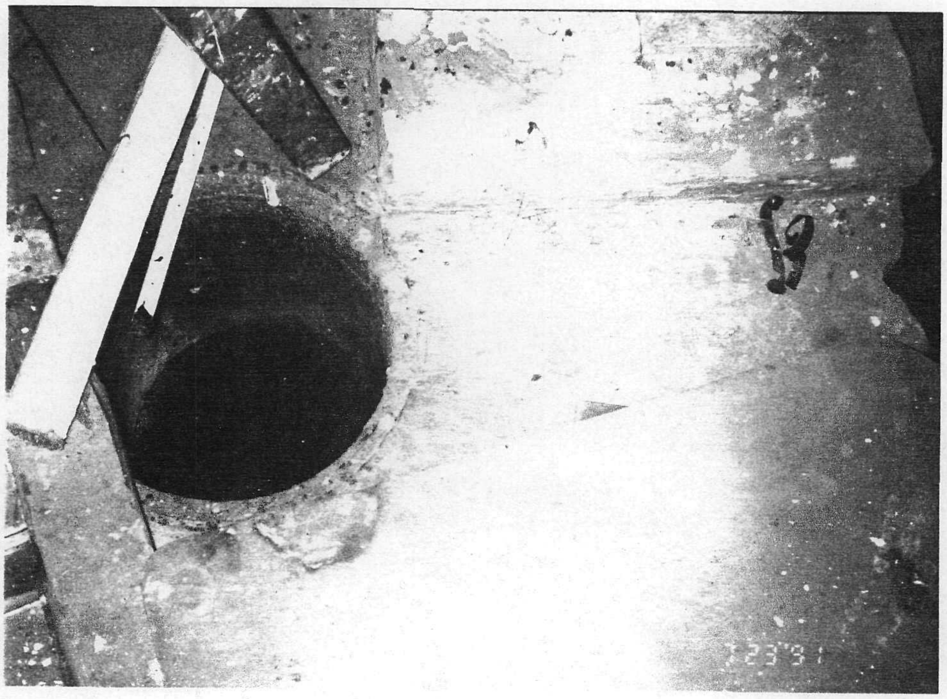
Photograph No. 25
Location: Building 3-B
Orientation: East
Date: 07/23/91
Description:

This picture shows a trench in Building 3-B. Note the debris and the condition of the grating over the trench. Also note the standing liquid.

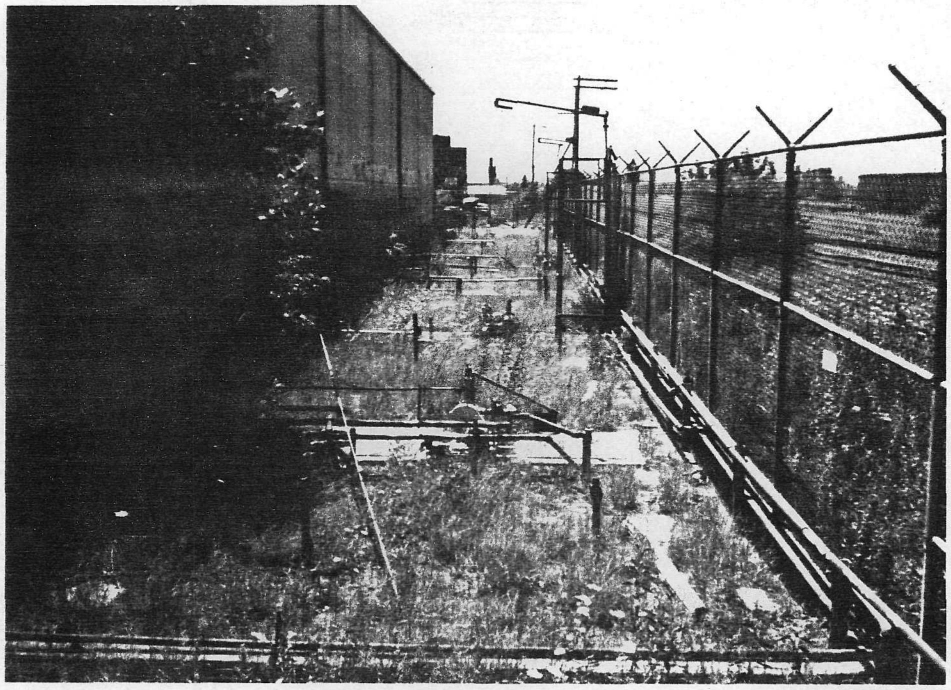
Photograph No. 26
Location: Building 3-F
Orientation: Northeast
Date: 07/23/91
Description:

This picture shows a portion of Building 3-F. The inspection team noted oil stains on the floor near an old transformer. The oil may contain PCBs. The inspection team also noted piping insulation in this building. The insulation may contain asbestos.

Photograph No. 27 | Location: Building 3-F
Orientation: North | Date: 07/23/91
Description: This picture shows an overturned bucket of what appeared to be oil in Building 3-F.



Photograph No. 28 | Location: Building 3-F
Orientation: West | Date: 07/23/91
Description: This picture shows a sump in Building 3-F. The entire room was surrounded by trenches, and it appeared that the trenches drained into this sump through the channel running from right to left in the picture. Note the piping insulation. It may contain asbestos.

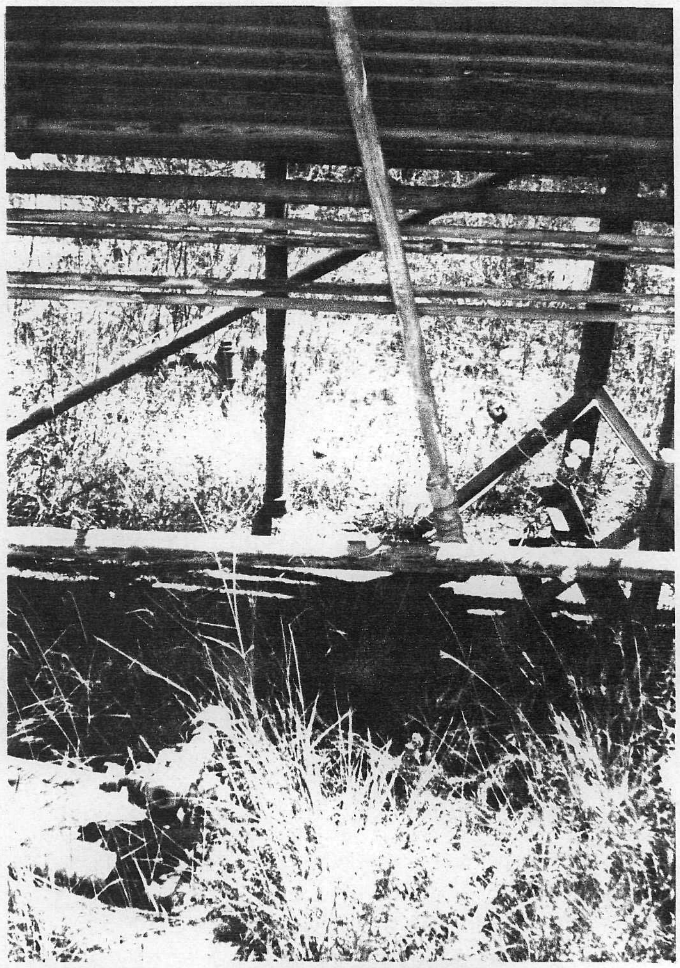


Photograph No. 29 Location: South tank area
Orientation: South Date: 07/23/91
Description: This picture shows the south tank area. The picture was taken from the concrete southern berm in the northern tank area. The building on the left side of the picture belongs to Armstrong Containers.

Photograph No. 30 Location: North tank area
Orientation: North Date: 07/23/91
Description: This picture shows the west end of the north tank area. The picture was taken from the southern berm in the north tank area. The underground tank fill pipes are on the left. The access holes are on the right. The buildings in the background are part of the facility.

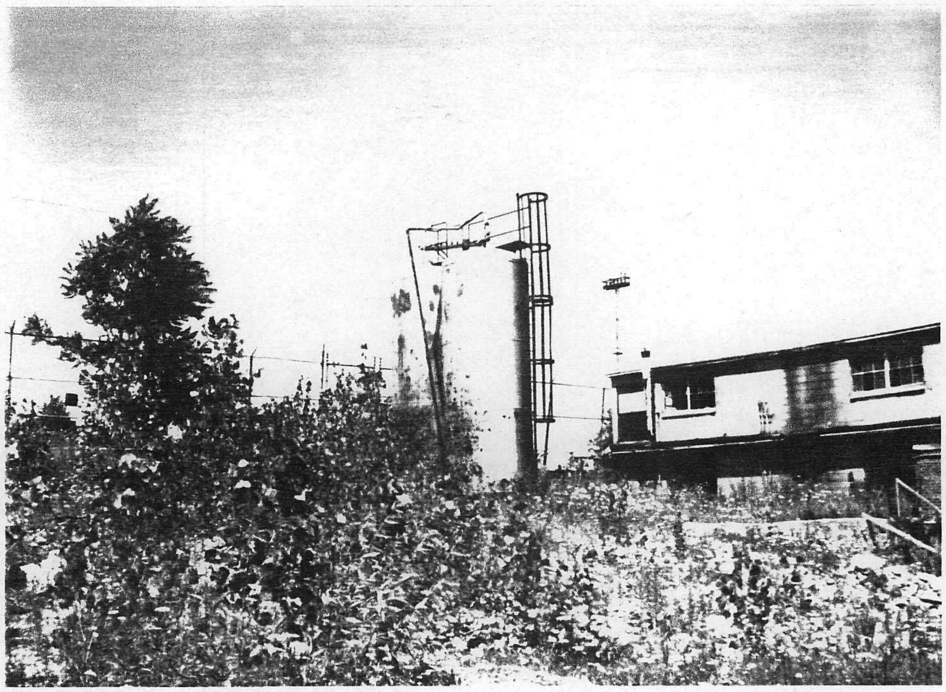
Photograph No. 31
Location: North tank farm
Orientation: East
Date: 07/23/91
Description:

This picture shows the pipelines that separate the east and west ends of the north tank farm. Note the absence of vegetation directly underneath the pipelines.

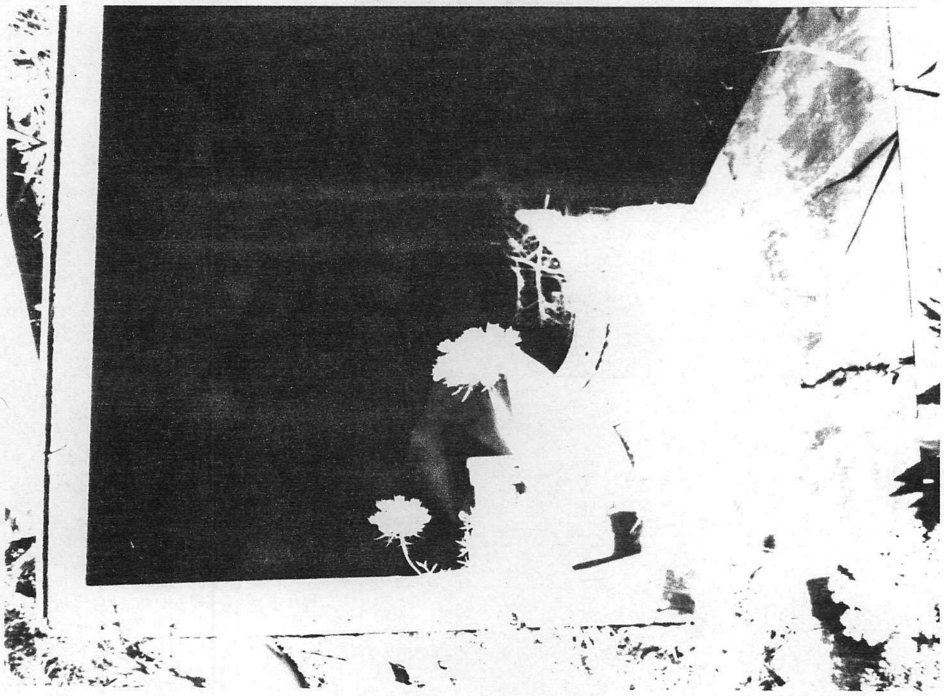


Photograph No. 32 Location: West lot
Orientation: North Date: 07/23/91
Description: This picture shows the western portion of the facility. At one time, this area contained the superstructures of Buildings 4, 4-A, 4-B, 4-C, 17, 17-A, 21, and 22. These buildings have been demolished, and the lot has been graded with fill over the foundations, which remain.

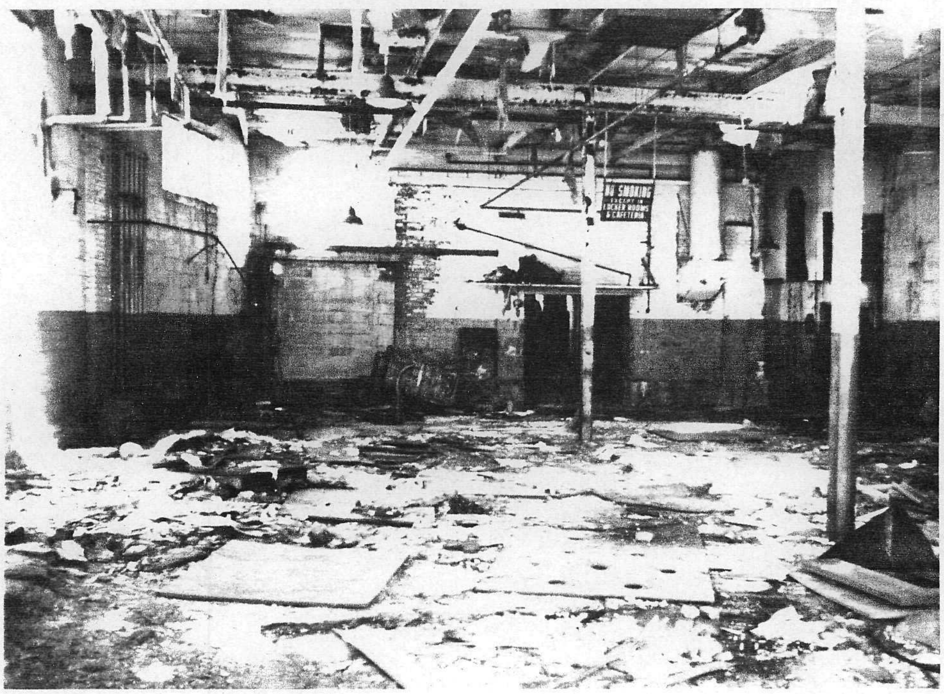
Photograph No. 33 Location: West lot
Orientation: Northeast Date: 07/23/91
Description: This picture shows an overview of the facility. The vegetated area in the foreground is the west lot. The seven-story structure in the background consists of Buildings 7, 8, and 12.



Photograph No. 34 Location: West lot
Orientation: Northwest Date: 07/23/91
Description: This picture shows Tanks 295 and 296. According to Valspar representatives, these tanks were probably solvent storage tanks when Valspar used the facility.



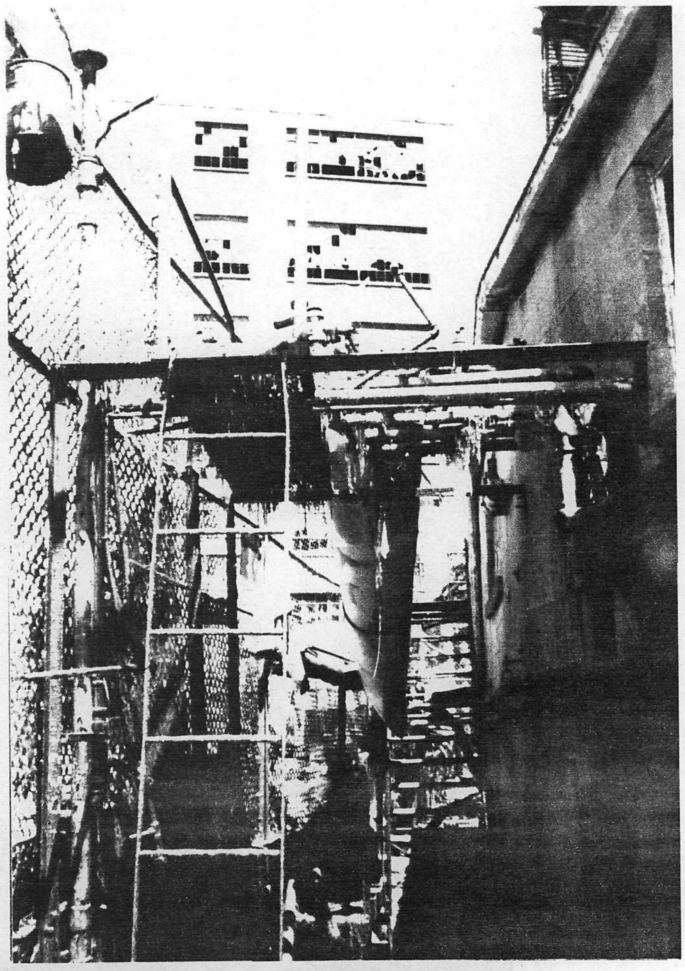
Photograph No. 35 Location: South of Cooper's Pit
Orientation: West Date: 07/23/91
Description: This picture shows an accessway into an underground storage tank south of the Cooper's Pit (Building 7-C). Two of these accessways were located during the VSI; more may be present.



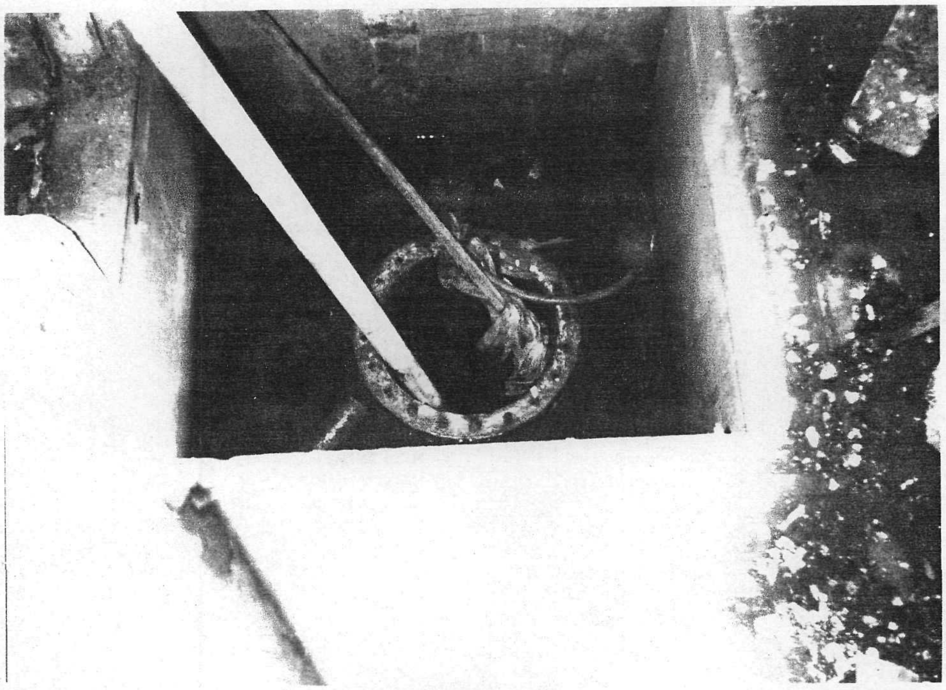
Photograph No. 36 Location: Cooper's Pit
Orientation: North Date: 07/23/91
Description: This picture shows an overview of the Cooper's Pit. Each plywood sheet seen in the picture is covering an accessway into an underground storage tank. PRC did not disturb any of these plywood sheets. Note that clothing is scattered across the west side of the Cooper's Pit.

Photograph No. 37
Location: West of Cooper's Pit
Orientation: North
Date: 07/23/91
Description:

This picture shows the leaking pipes on the west side of the Cooper's Pit. The leaking material is forming columns that resemble stalactites. Building 7 is visible in the background.

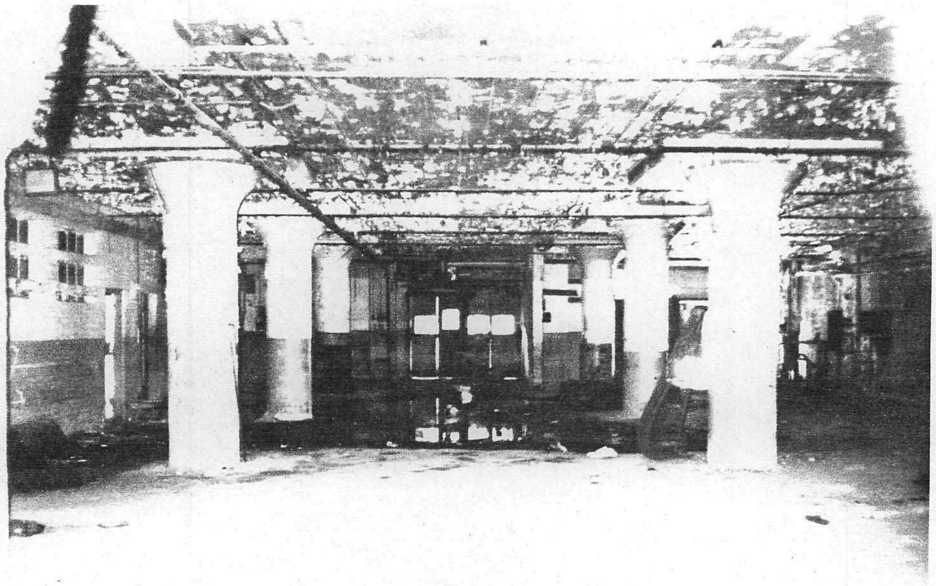


Photograph No. 38
Location: West of Cooper's Pit
Orientation: North
Date: 07/23/91
Description: This picture shows the ground underneath the leaking pipes on the west side of the Cooper's Pit. The ground in this area is spongy, and it gave way when PRC stepped on it. When the inspection team retreated from this area, it noticed that the yellowish pools of liquid visible in the picture had seeped from the solidified pools on the ground.



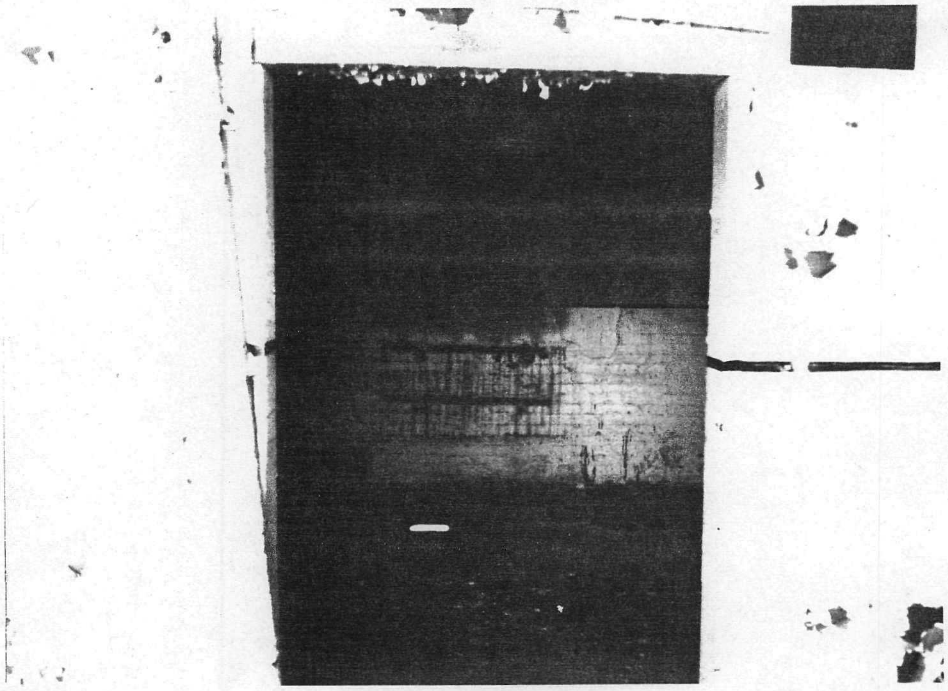
Photograph No. 39 Location: Cooper's Pit
Orientation: West Date: 07/23/91
Description: This picture shows an accessway into one of the underground storage tanks in the Cooper's Pit. Note that the rectangular opening is partially filled with liquid.

Photograph No. 40 Location: Building 7-B
Orientation: North Date: 07/23/91
Description: This picture shows two empty drums located in Building 7-B. Note the trench running in an east-west direction along the floor in the foreground. Also note the miscellaneous debris in the left background.

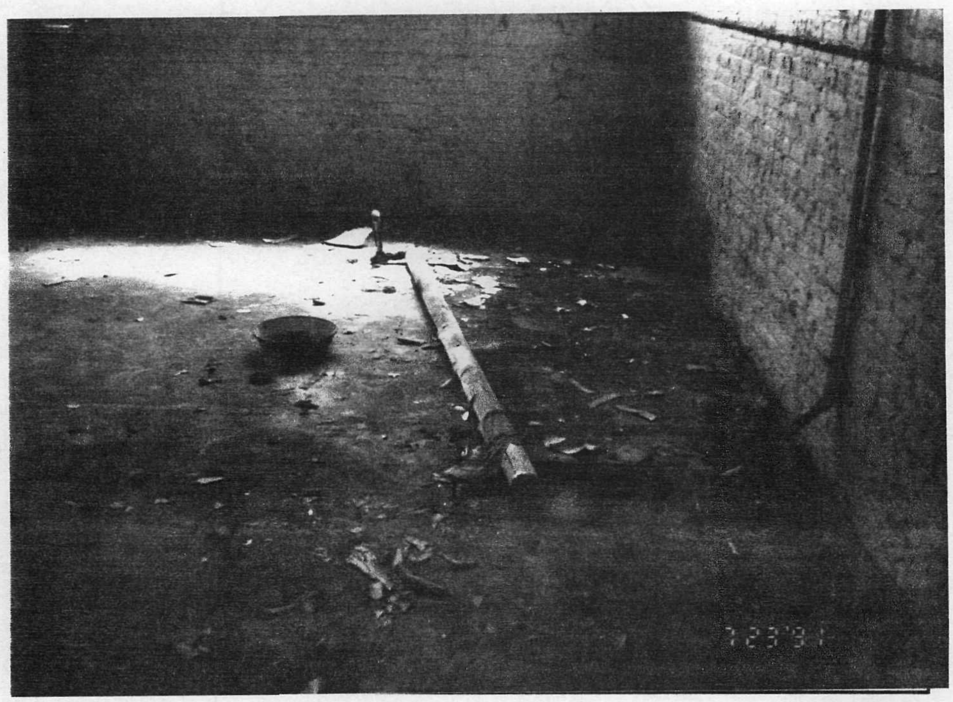


Photograph No. 41 Location: Building 7
Orientation: East Date: 07/23/91
Description: This picture shows an overview of Building 7. Upon close examination, the inspection team noted graffiti on the walls of this building. Based on that observation, it is likely that unauthorized persons have gained access to this building. Note the peeling paint on the ceiling.

Photograph No. 42 Location: Building 7
Orientation: East Date: 07/23/91
Description: This picture shows a leaking drum located by the north wall of Building 7.



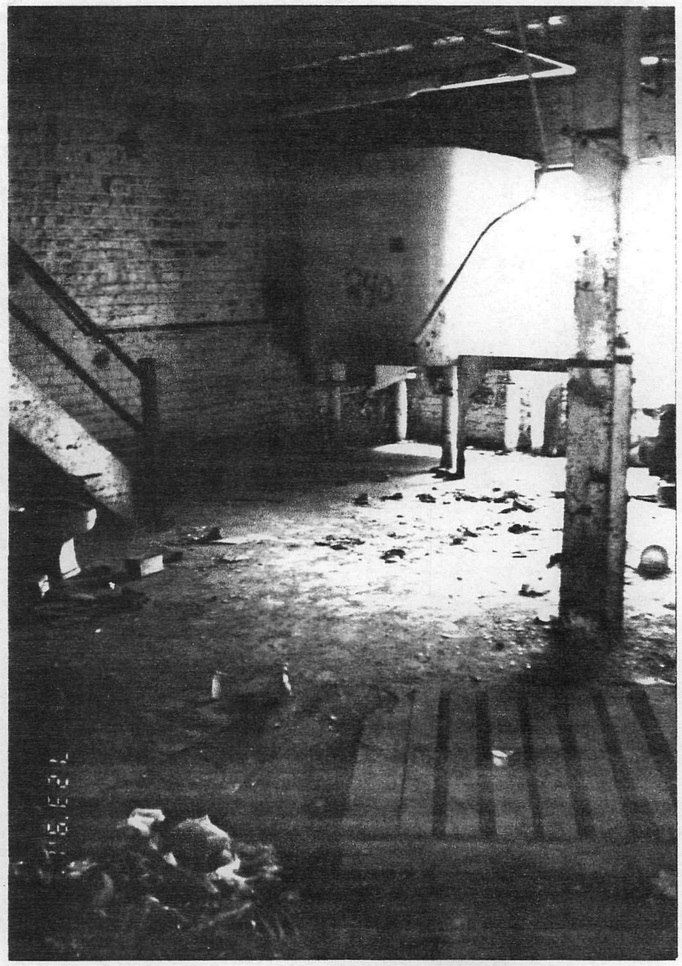
Photograph No. 43 Location: Buildings 1 and 2
Orientation: North Date: 07/23/91
Description: This picture shows a room in the middle of the complex consisting of Buildings 1 and 2. The floor in this room was stained with a dark, wet substance. The walls of the room were hidden by storage racks of some sort.

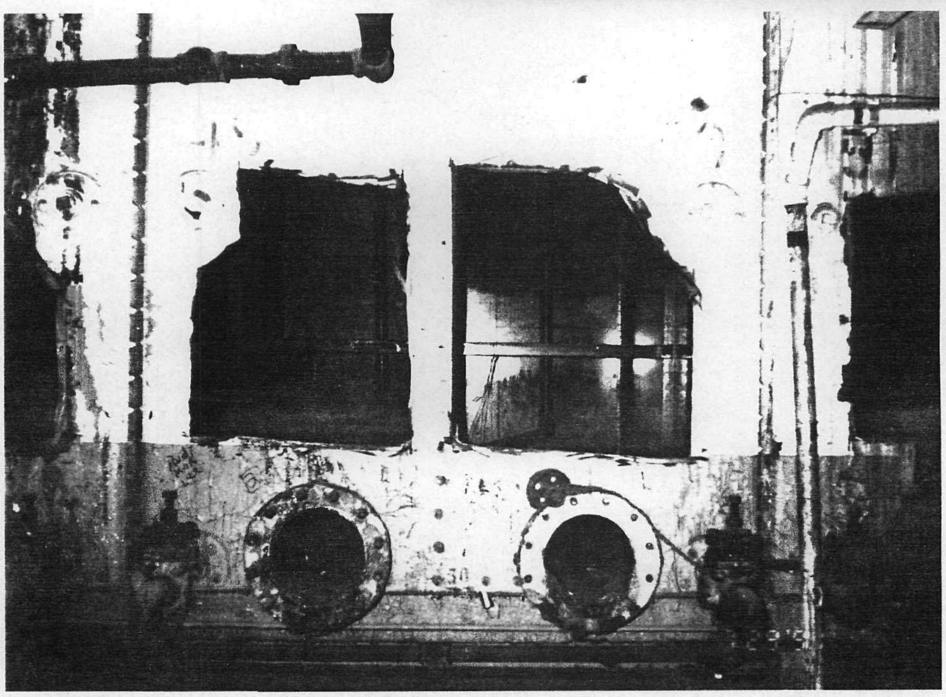


Photograph No. 44 Location: Buildings 1 and 2
Orientation: South Date: 07/23/91
Description: This picture shows the second floor of the west room in the complex consisting of Buildings 1 and 2. Note the algae-like growth on the floor in the background. Also note the piping insulation surrounding the fallen pipe. The insulation may contain asbestos.

Photograph No. 45
Location: Buildings 1 and 2
Orientation: Southeast
Date: 07/23/91
Description:

This picture shows the first floor of the west room of the complex consisting of Buildings 1 and 2. This room contains Tank 240. Several bags of used PPE were seen during the VSI. These bags had been ripped open and strewn about, possibly indicating that an unauthorized person had gained access to the site.

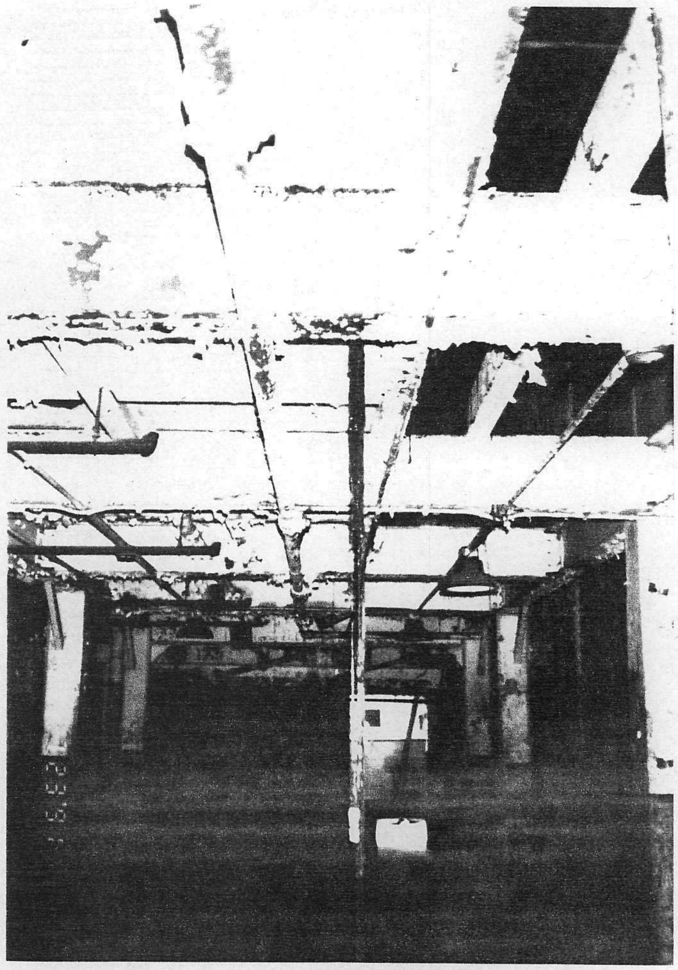




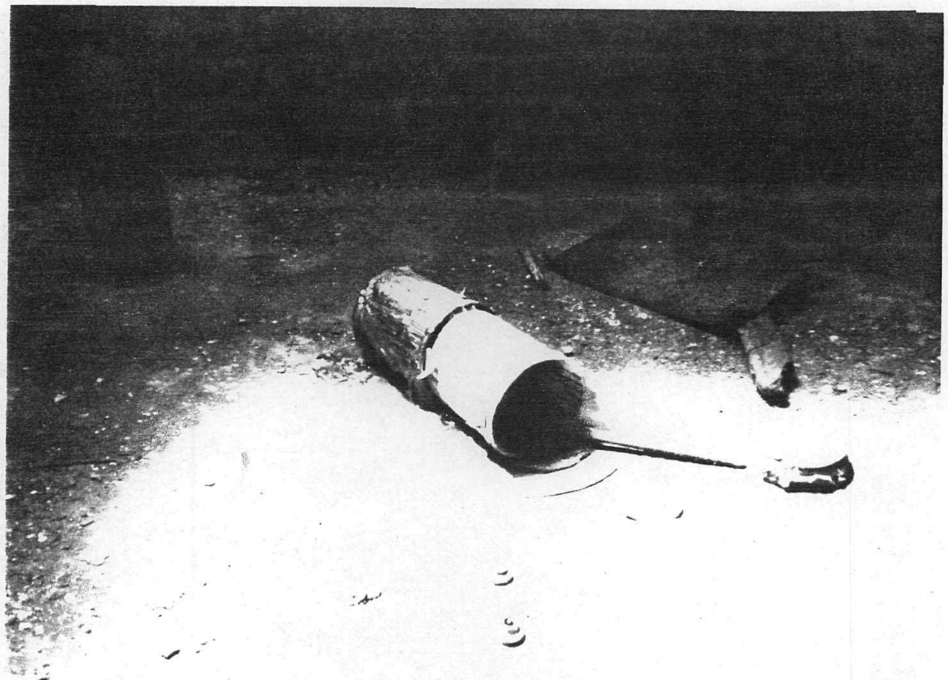
Photograph No. 46
Location: Building 6
Orientation: North
Date: 07/23/91
Description: This picture shows two of the tanks in Building 6 that have been cut open. Many other tanks in this building have also been cut open and drained.

Photograph No. 47
Location: Building 6
Orientation: West
Date: 07/23/91
Description:

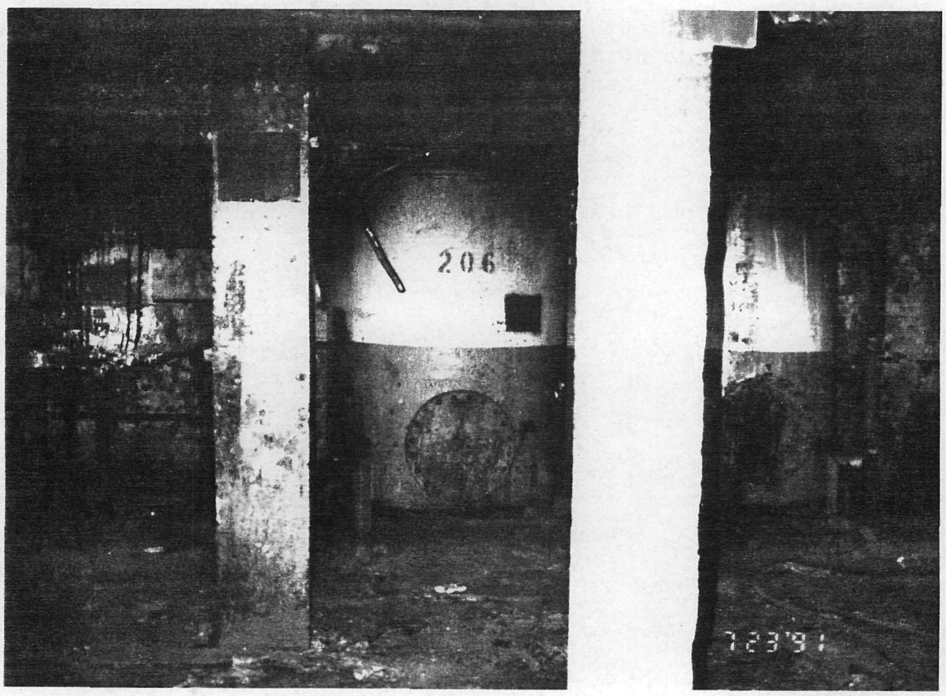
This picture shows what is likely to be resin dripping from an unknown source above the overhead walkway. Because large portions of the walkway had been vandalized, PRC did not attempt to locate the source of this leak. Note the peeling paint.



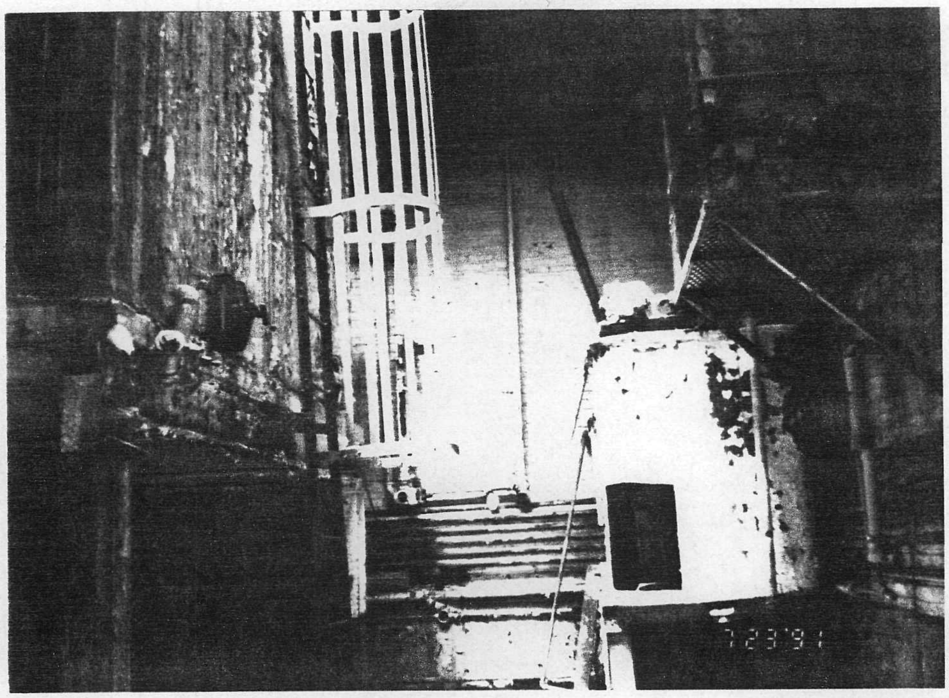
Photograph No. 48
Location: Building 6-A
Orientation: South
Date: 07/23/91
Description: This picture shows Tanks 91, 92, and 93. They are located on a deck built into Building 6-A.



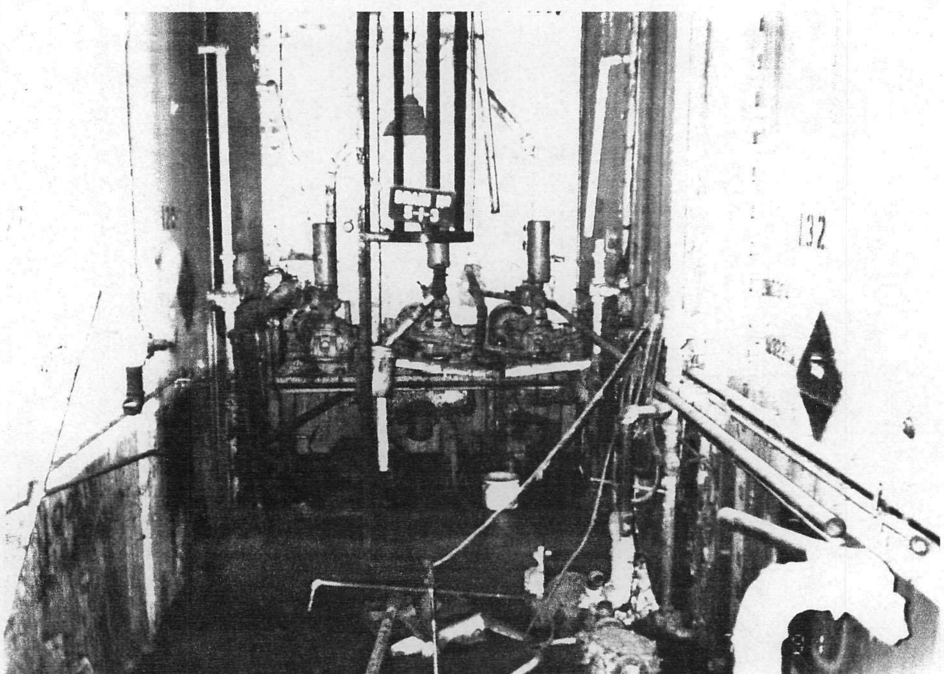
Photograph No. 49 Location: Building 6-A
Orientation: West Date: 07/23/91
Description: This picture shows the floor of Building 6-A. Two pails lying on their sides were leaking their contents to the floor during the VSI.



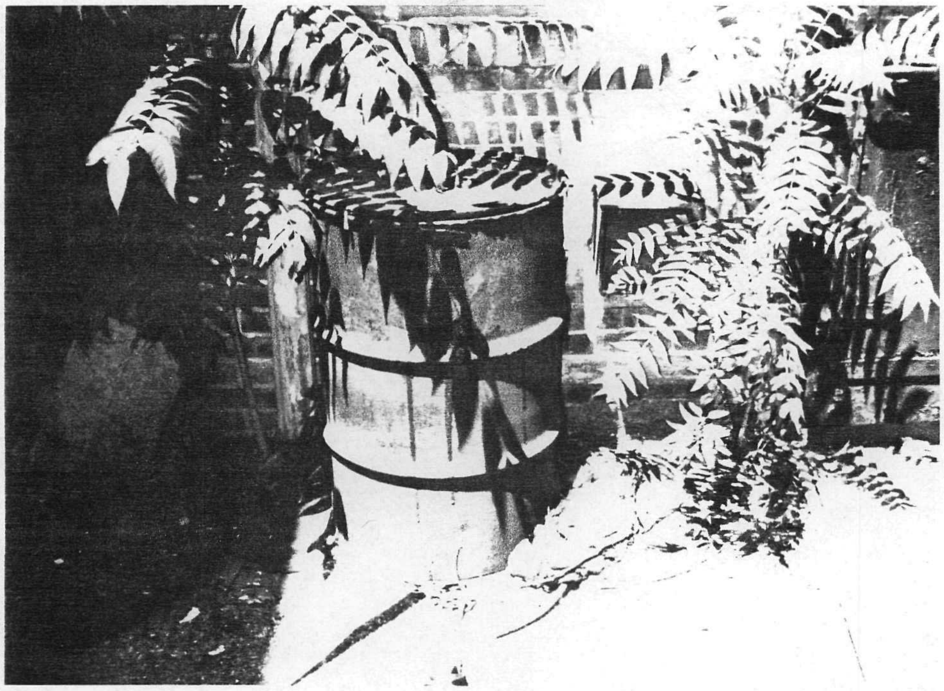
Photograph No. 50 Location: Building 5-A
Orientation: North Date: 07/23/91
Description: This picture shows two tanks located in Building 5-A. Note the peeling paint and the debris on the floor.



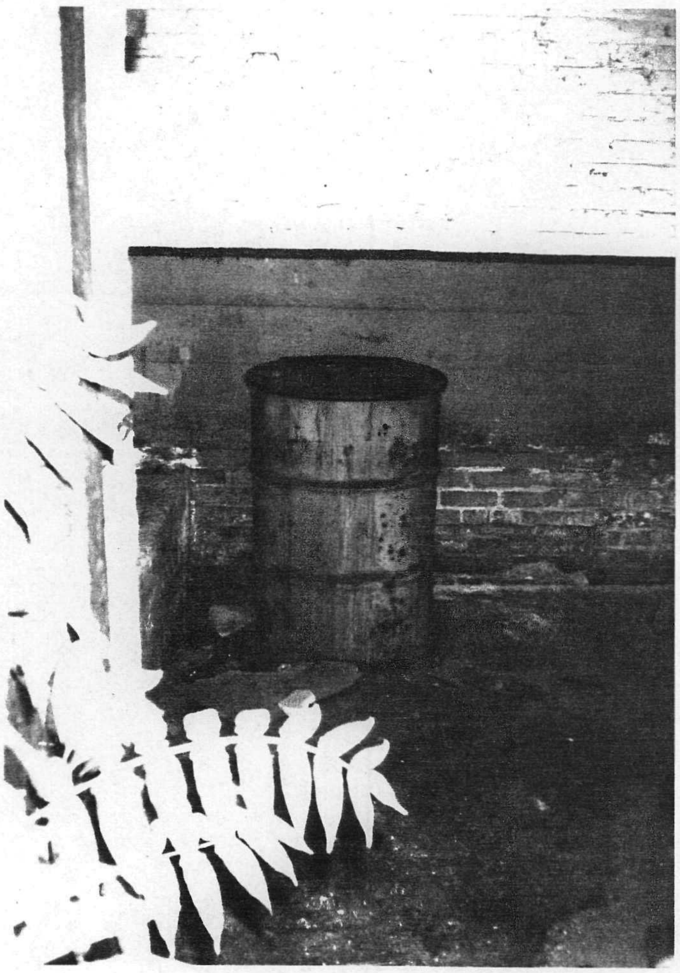
Photograph No. 51 Location: Building 5-B
Orientation: North Date: 07/23/91
Description: This picture shows the two tanks located in Building 5-B. Note that the smaller of the two tanks (right side of the picture) has been cut open and drained. Also note the peeling paint.



Photograph No. 52 Location: Building 5-C
Orientation: North Date: 07/23/91
Description: This picture shows the interior of Building 5-C. PRC could not enter this room because the floor was covered with 2 to 3 feet of dark-colored liquid. Note that some of the pipelines in the background have been cut and drained.

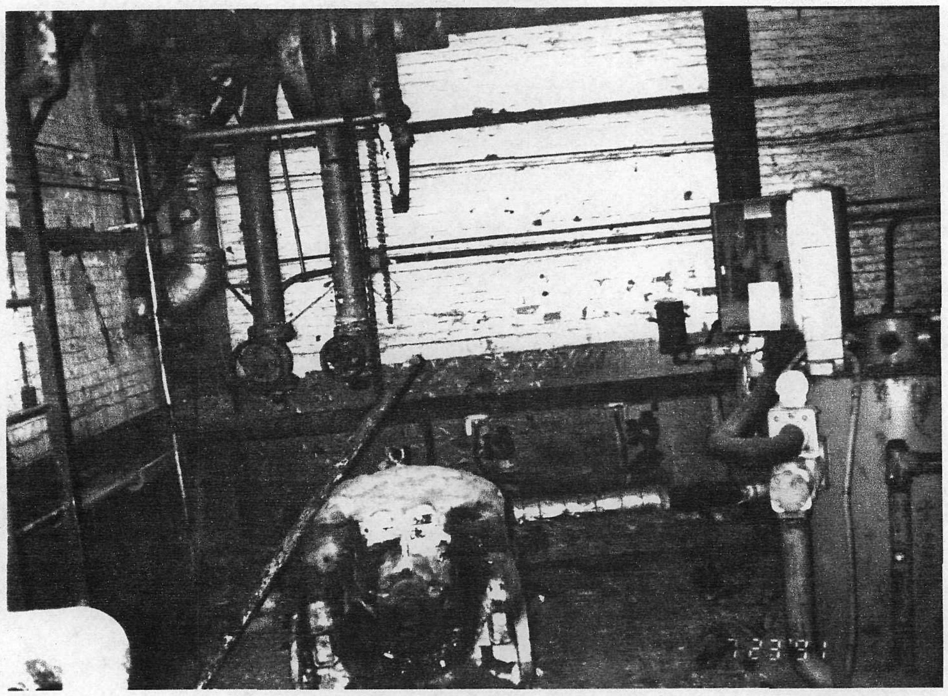


Photograph No. 53 Location: South of Building 5-D
Orientation: North Date: 07/23/91
Description: This picture shows the drum located outside Building 5-D. This drum contained a solid material. Headspace measurements on the drum with a PID indicated 26.5 parts per million (ppm) volatile organics.

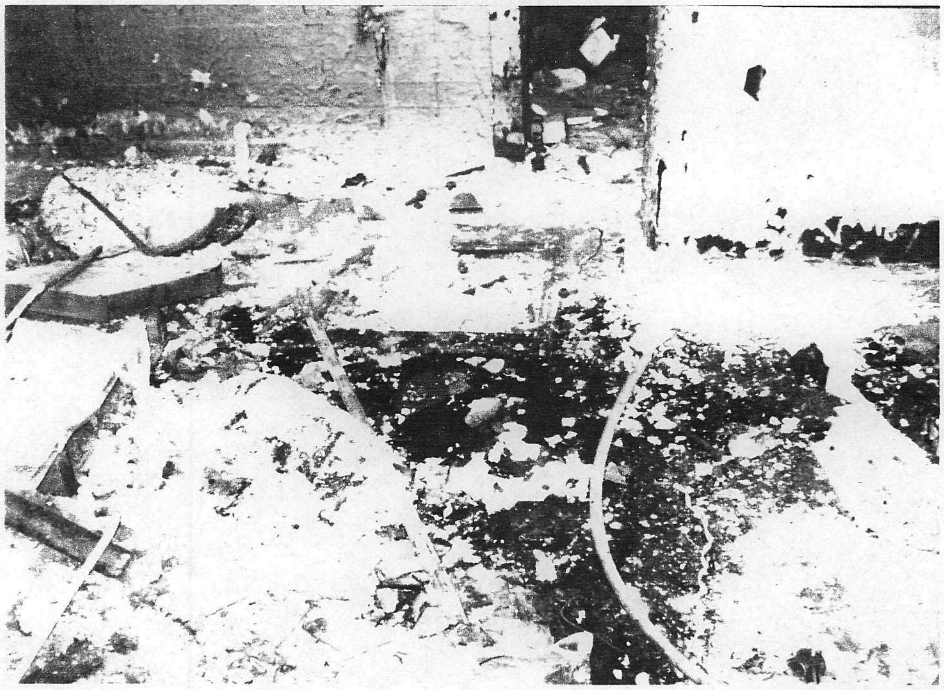


Photograph No. 54
Location: Building 5-D
Orientation: North
Date: 07/23/91
Description:

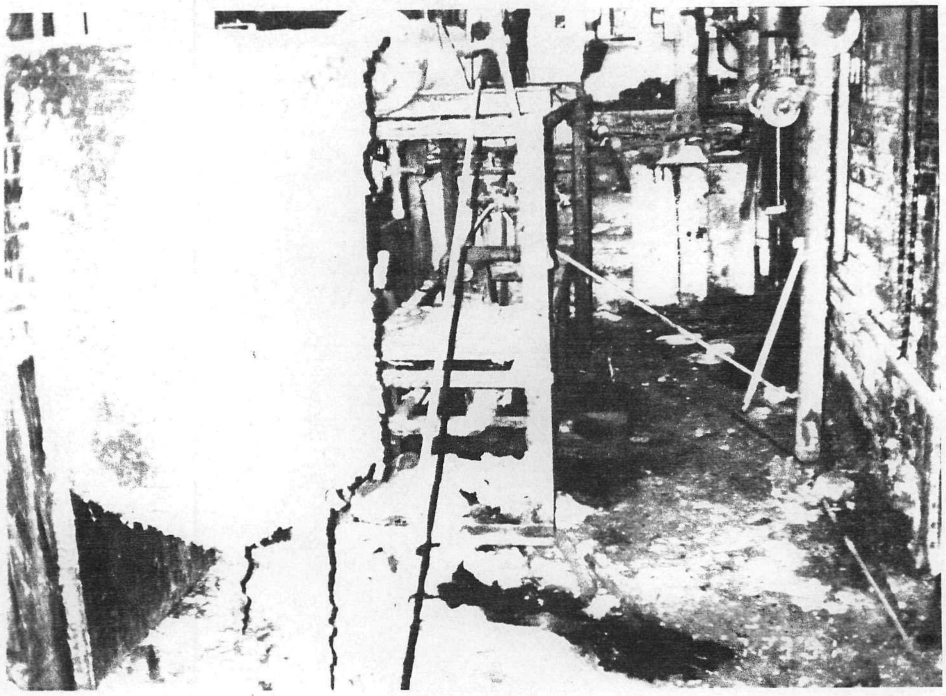
This picture shows one drum located inside Building 5-D. This drum was completely filled with liquid, was loosely covered, and contained volatile constituents. The PID indicated that the drum headspace contained more than 5,000 ppm volatile organics.



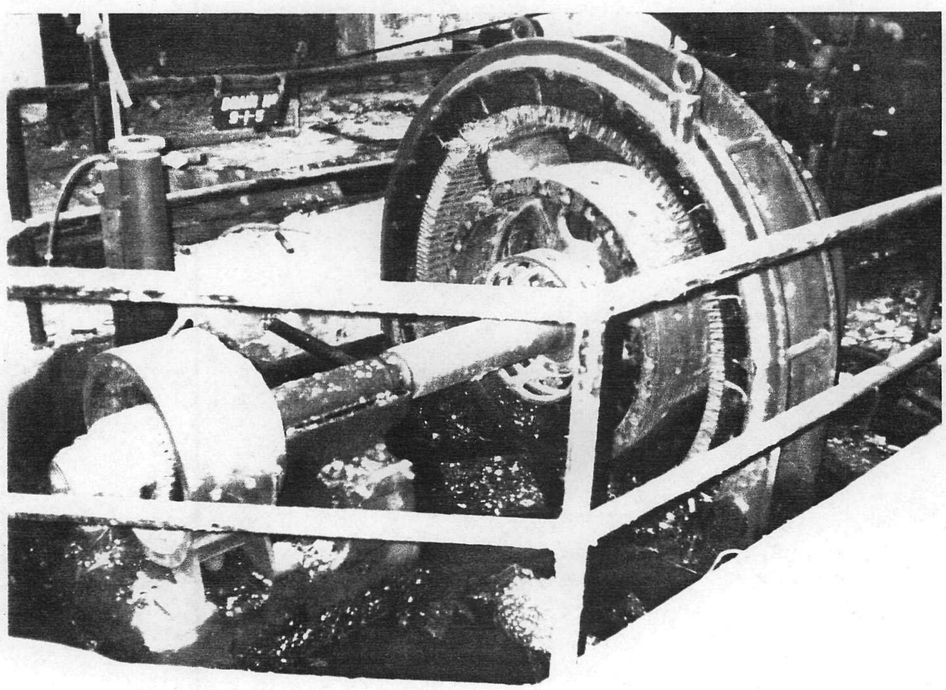
Photograph No. 55 Location: Building 9-A
Orientation: West Date: 07/23/91
Description: This picture shows part of the boiler room. Note the dark stains along the wall in the background. They may be caused by boiler oil containing PCBs.



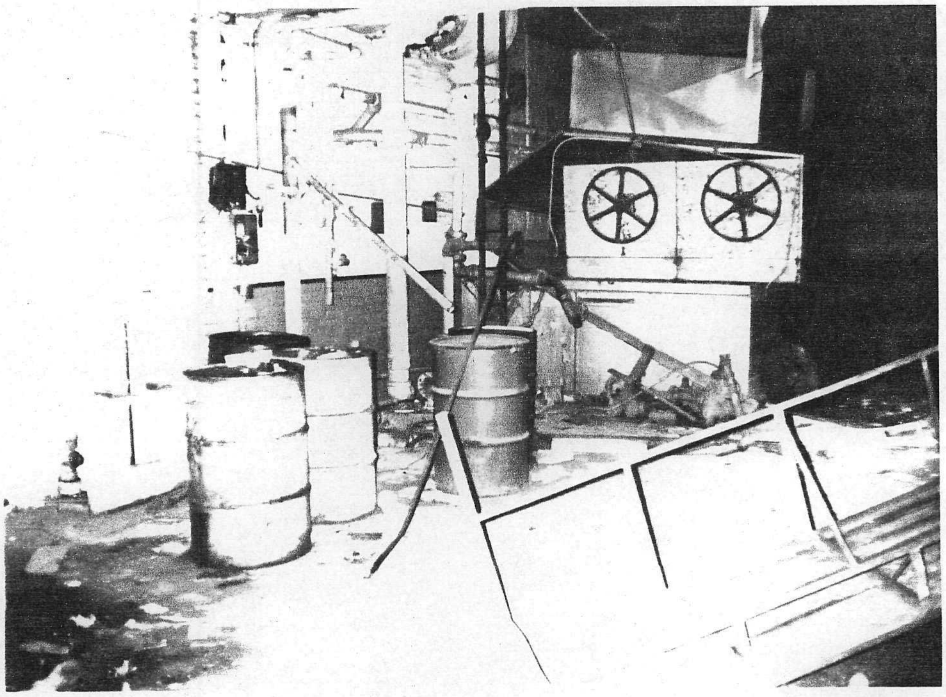
Photograph No. 56 Location: Building 9-C
Orientation: West Date: 07/23/91
Description: This picture shows a pool of oil in the boiler room in Building 9-C. Note the quantity of dust and other debris in this room. The pool of oil may contain PCBs.



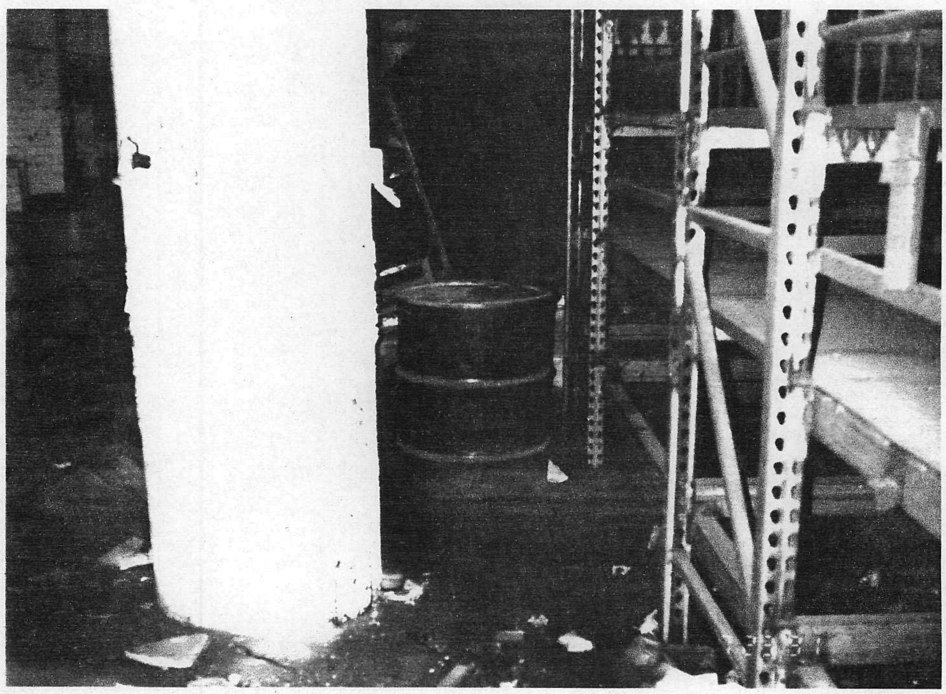
Photograph No. 57 Location: Building 9-C
Orientation: West Date: 07/23/91
Description: This picture shows part of the boiler room in Building 9-C. Note the oil pools on the floor. The oil may contain PCBs. Piping insulation that may contain asbestos is also visible in this picture.



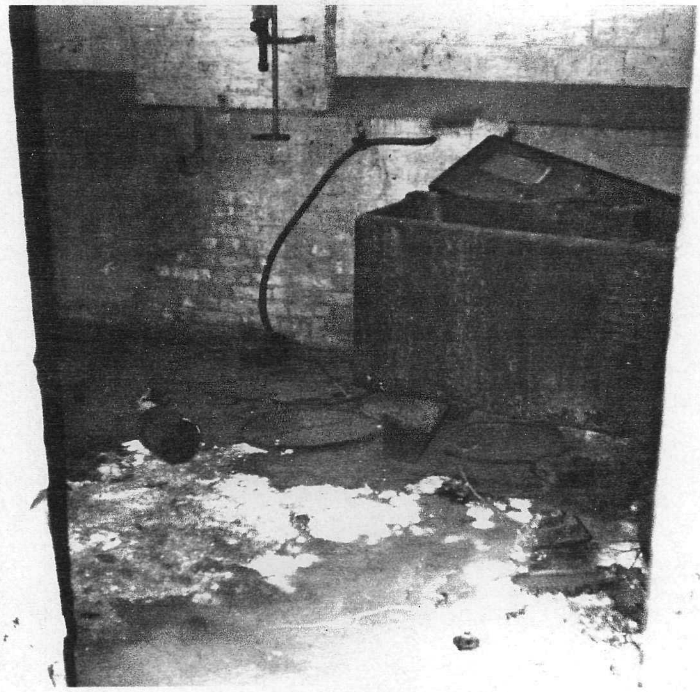
Photograph No. 58 Location: Building 9
Orientation: Northeast Date: 07/23/91
Description: This picture shows the power drive on a boiler engine in Building 9. The power drive is located in a trench that was partially filled with a dark liquid, possibly oil. If the liquid is oil, it may contain PCBs.



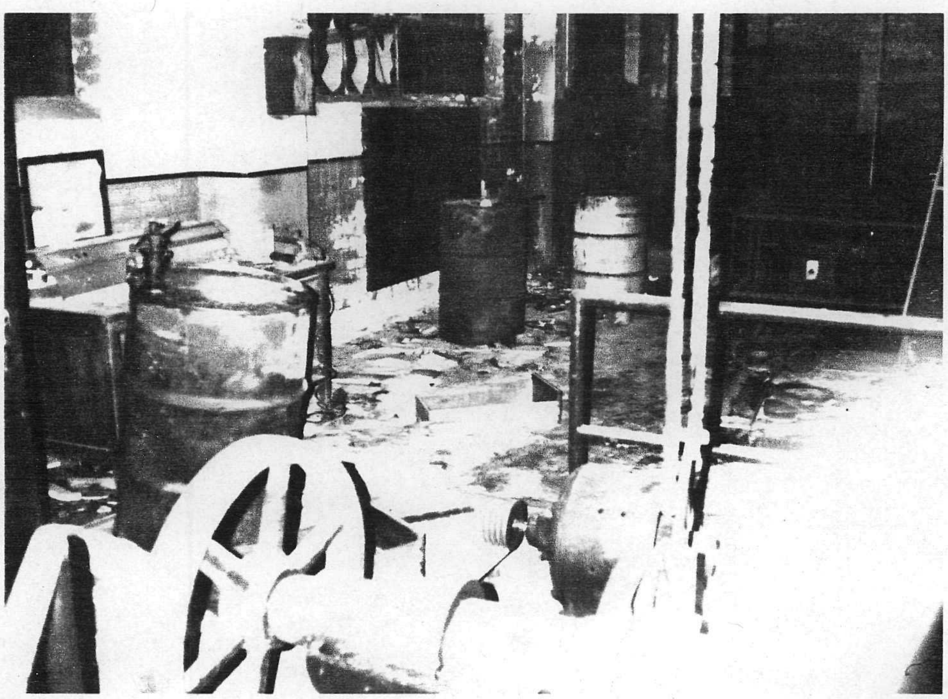
Photograph No. 59 Location: Building 8
Orientation: Northeast Date: 07/23/91
Description: This picture shows six drums in Building 8. One of the drums contained volatile organics (headspace readings of 600 ppm were taken). The other drums may contain oil and possibly PCBs. Note the white dust on the floor of this building in the right background. Also note the oily stains in the lower left corner of the picture.



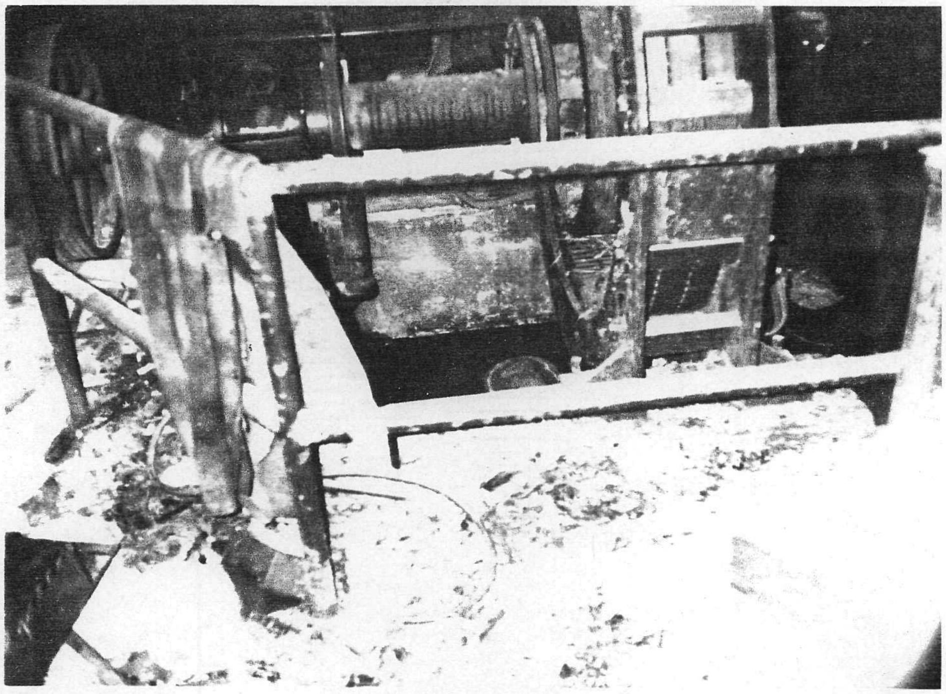
Photograph No. 60 Location: Building 8
Orientation: Northeast Date: 07/23/91
Description: This picture shows a single drum located south of the other six drums in Building 8. This drum contains volatile constituents (headspace readings of 5 ppm were taken). Note that the floor near this drum is stained. The metal racks seen at the right side of the picture indicate that this part of the room may have been used for storage of small containers.



Photograph No. 61 Location: Building 8
Orientation: West Date: 07/23/91
Description: This picture shows the room in the southwest corner of Building 8. The white stains in the center of the picture resembled caustic residue. Note the dust in the lower right corner of the picture.



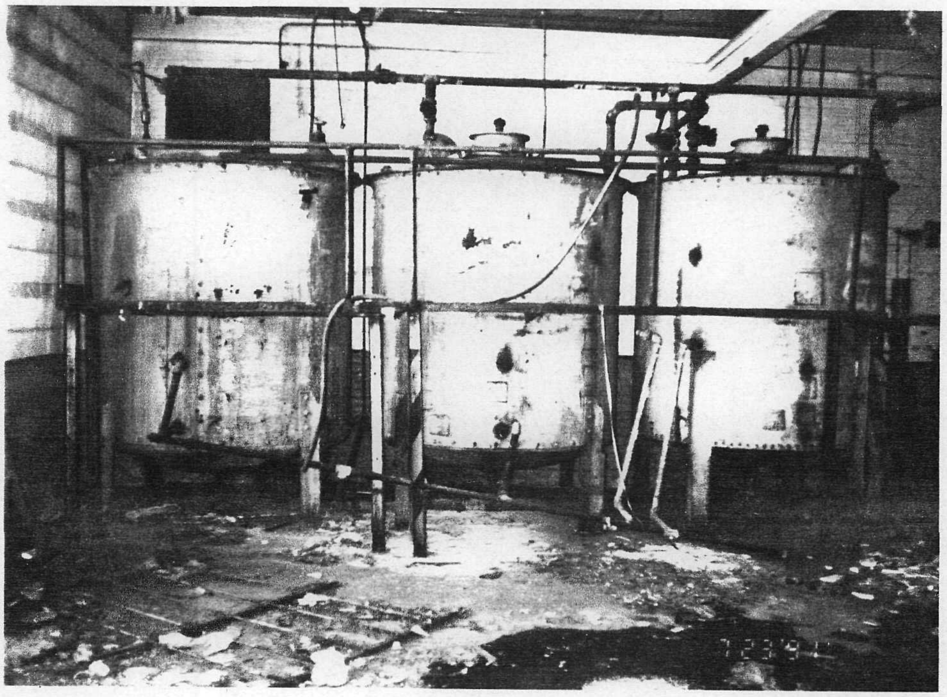
Photograph No. 62 Location: Building 8
Orientation: East Date: 07/23/91
Description: This picture shows three drums located along the north wall in the generator room of Building 8. The two drums in the background may contain volatile organics, and the ambient air around these drums indicated an elevated level of volatile organics. Note the white dust on the floor of this room.



Photograph No. 63 Location: Building 8
Orientation: East Date: 07/23/91
Description: This picture shows the power drive on one of two boiler engines located in the generator room in Building 8. Note the dark, oily liquid in the channel underneath the power drive. The oily liquid may contain PCBs.

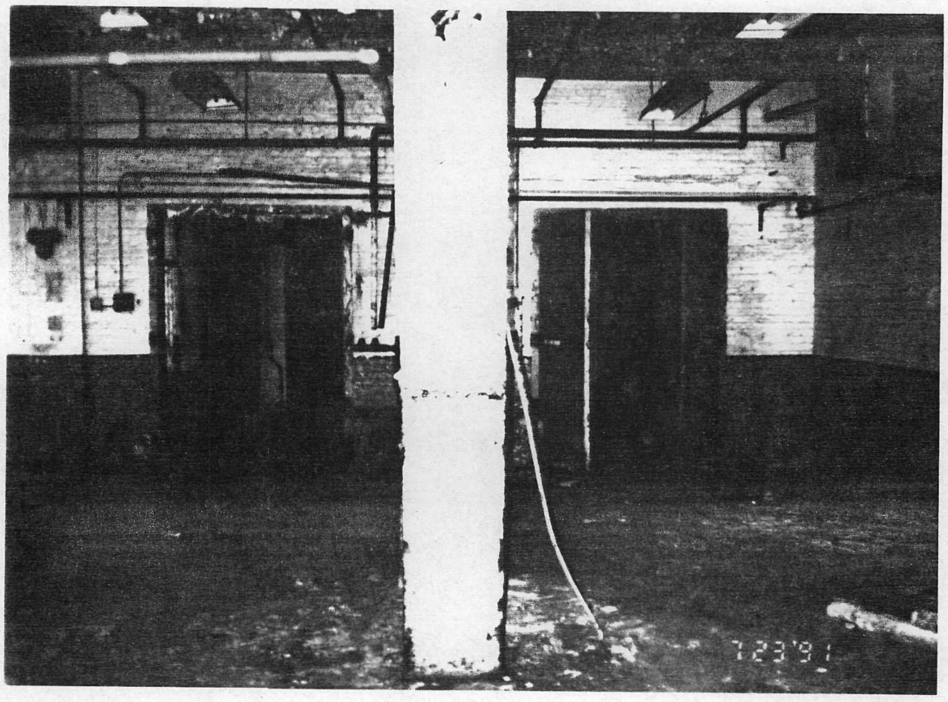
Photograph No. 64 Location: Building 8
Orientation: North Date: 07/23/91
Description: This picture shows one drum located in the northwest corner of the generator room in Building 8. This drum may contain oil and possibly PCBs.

Photograph No. 65 Location: Building 8
Orientation: Southwest Date: 07/23/91
Description: This picture shows two drums located in the southwest corner of the generator room in Building 8. Both drums contain volatile constituents (headspace readings of 0.2 and 50 ppm were taken). Note the white dust and peeling paint in this corner.



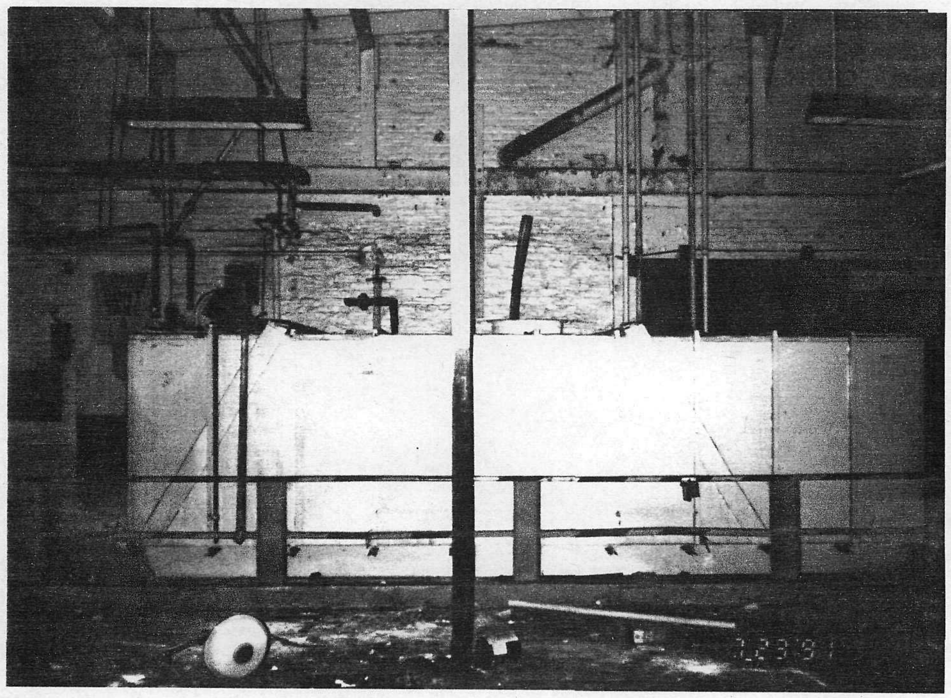
Photograph No. 66 Location: Building 10-A
Orientation: South Date: 07/23/91
Description: This picture shows three paint tanks located against the southern wall of the northern portion of Building 10-A. Note the damp areas on the floor.

Photograph No. 67 Location: Building 10-A
Orientation: Southwest Date: 07/23/91
Description: This picture shows one drum located in Building 10-A near the middle of the first floor. The drum contains volatile organics (headspace readings of 3 ppm were taken). Note the amount of liquid and white dust on the floor of this room.



Photograph No. 68 Location: Building 10
Orientation: West Date: 07/23/91
Description: This picture shows Tanks 1, 2, 3, and 4 located on the first floor of Building 10. The tanks are located against the doors in the background. Stairways beneath the tanks were not explored by the inspection team because of safety concerns. Note the white powder on the floor in the right background. Also note the oily stains on the ground near the piping insulation (which may contain asbestos) in the right foreground.

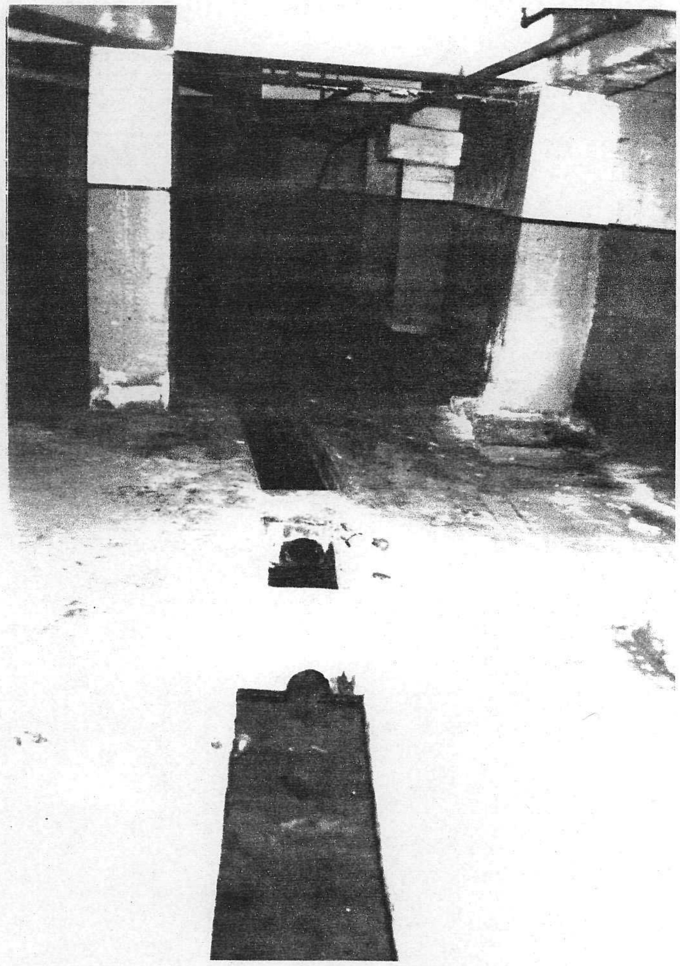
Photograph No. 69 — Location: Building 11
Orientation: West — Date: 07/23/91
Description: This picture shows a tank accessway located on the first floor of Building 11. The accessway apparently leads into a tank located in the basement of this building. A number of these accessways were covered with plywood sheets. PRC did not disturb any of these coverings.

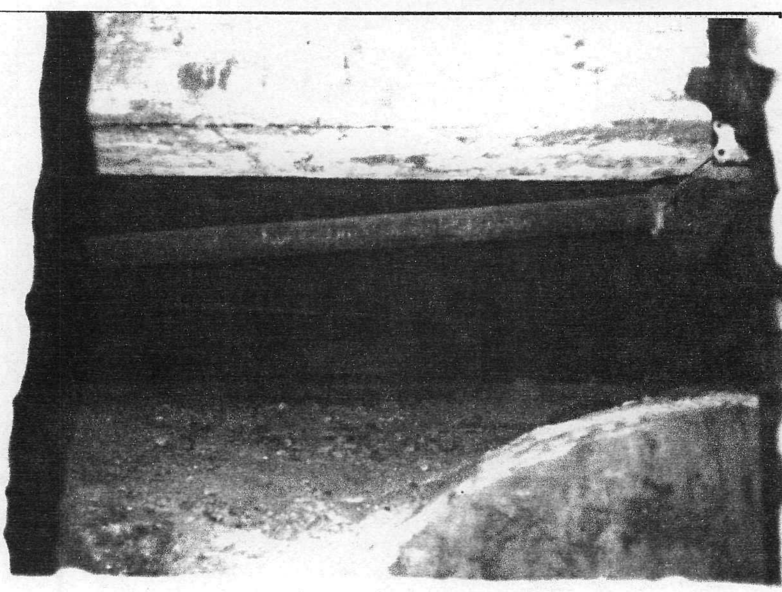


Photograph No. 70 — Location: Building 11
Orientation: South — Date: 07/23/91
Description: This picture shows a large tank located against the south wall of the first floor of Building 11. An accessway into the tank is located on top of the tank, but PRC did not examine this closely because of safety concerns. The yellow guardrails around the tank may indicate that it contained hazardous constituents or that the tank was in some other way dangerous. Note the white powder on the floor in front of the tank. The tank was labelled "Valspar."

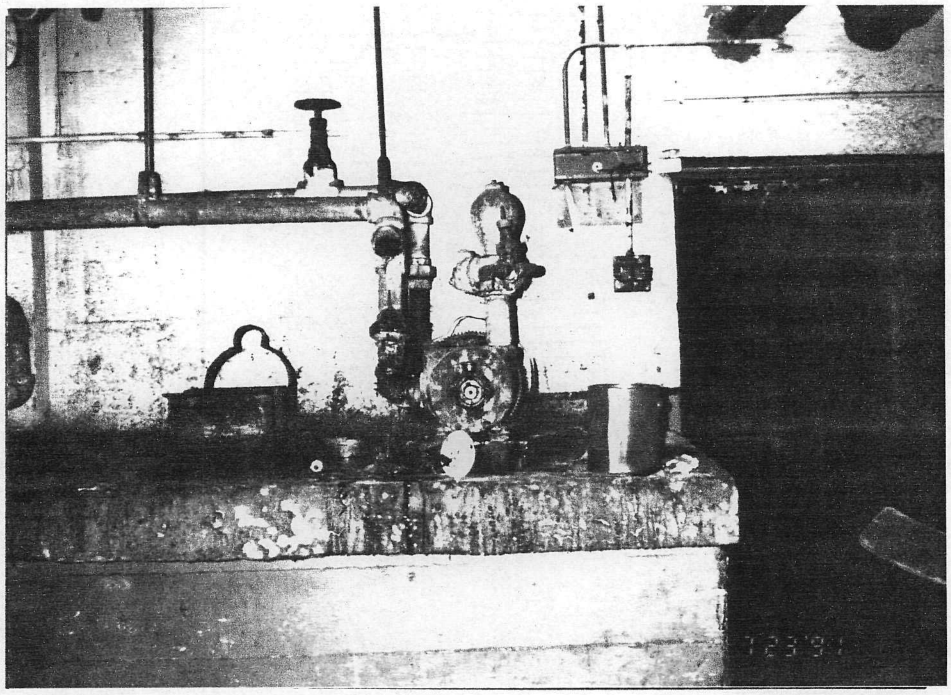
Photograph No. 71
Location: Building 11
Orientation: North
Date: 07/23/91
Description:

This picture shows a trench running in a north-south direction in the basement of Building 11. The trench was filled with a yellow-colored liquid. Note the white powder throughout the room.

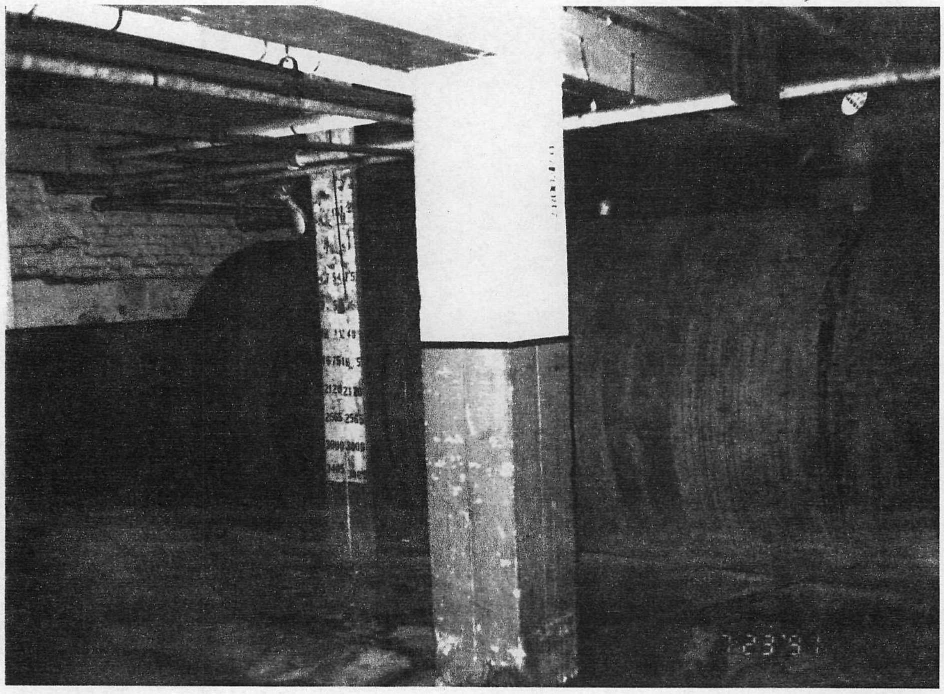




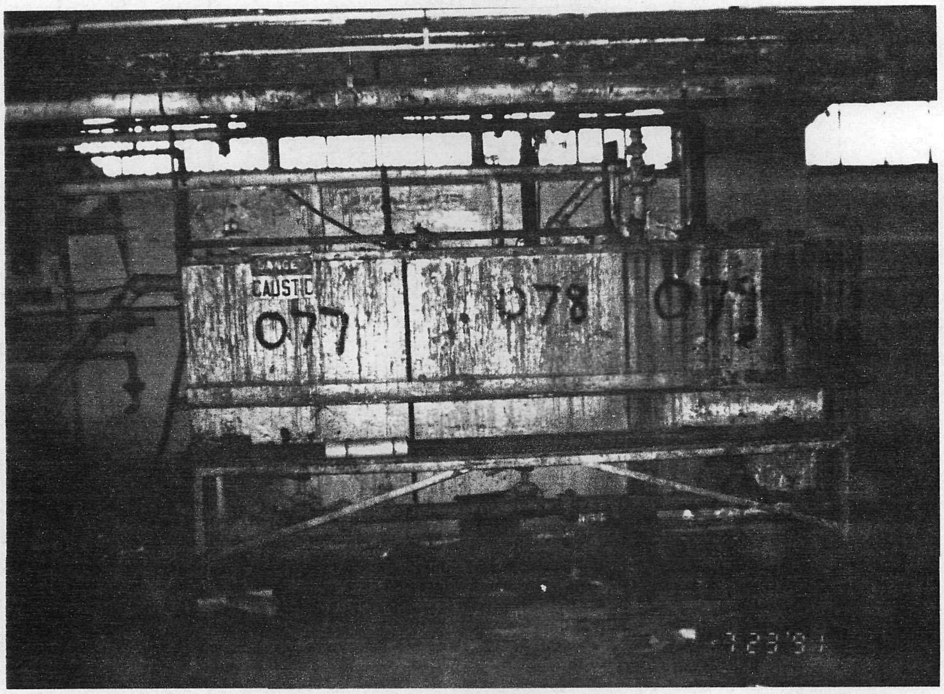
Photograph No. 72 Location: Building 11
Orientation: North Date: 07/23/91
Description: This picture shows a number of tanks partially buried with dirt or fill. This picture was taken through a rectangular opening in the wall of Building 10 and may show the area underneath Tanks 1, 2, 3, and 4. However, the exact location of these tanks with respect to the tanks on the first floor is unknown. No basement plans were provided by Goodwill or Valspar representatives.



Photograph No. 73 Location: Building 11
Orientation: South Date: 07/23/91
Description: This picture was taken in the basement of Building 11. It shows a leaking pipeline that probably contains resin.

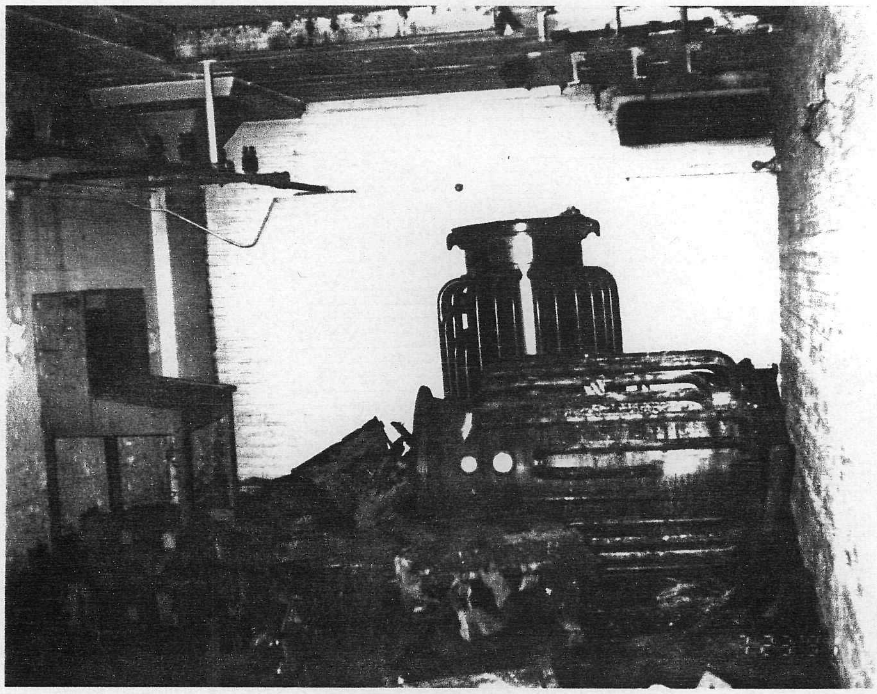


Photograph No. 74 Location: Building 11
Orientation: East Date: 07/23/91
Description: This picture shows one of four 10,000-gallon tanks located in the basement of Building 11. The other tanks are arranged behind the tank pictured here. Note the stains on the ground in front of the tank.

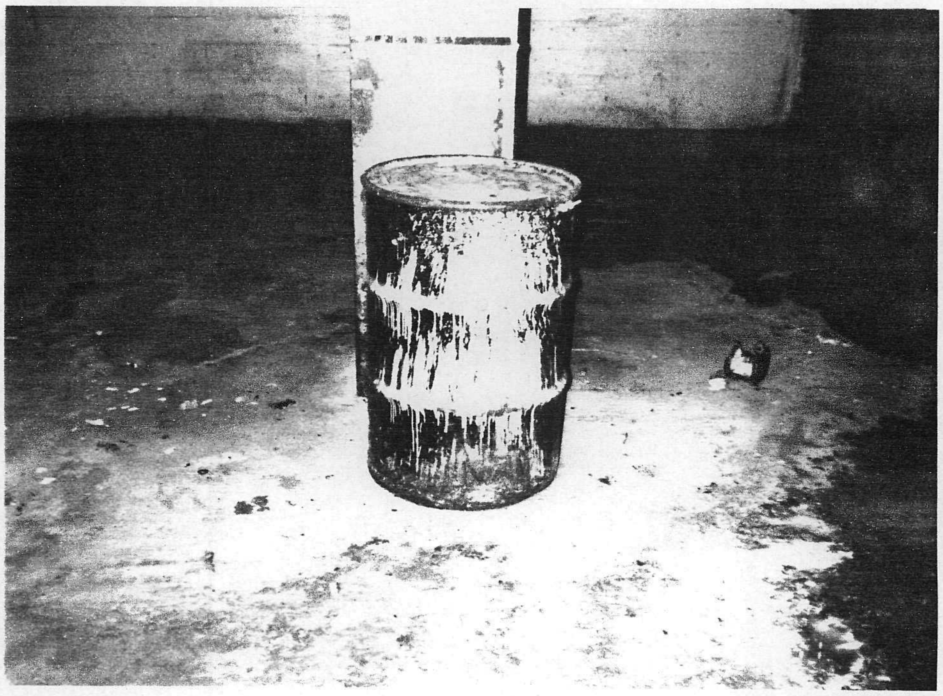


Photograph No. 75 Location: Building 12
Orientation: East Date: 07/23/91
Description: This picture shows Tanks 77, 78, and 79. These tanks are located in the basement of Building 12. The tanks pictured here probably belonged to a caustic cleaning system when the plant was operational. Note the piping insulation located in front of Tank 77. This insulation may contain asbestos.

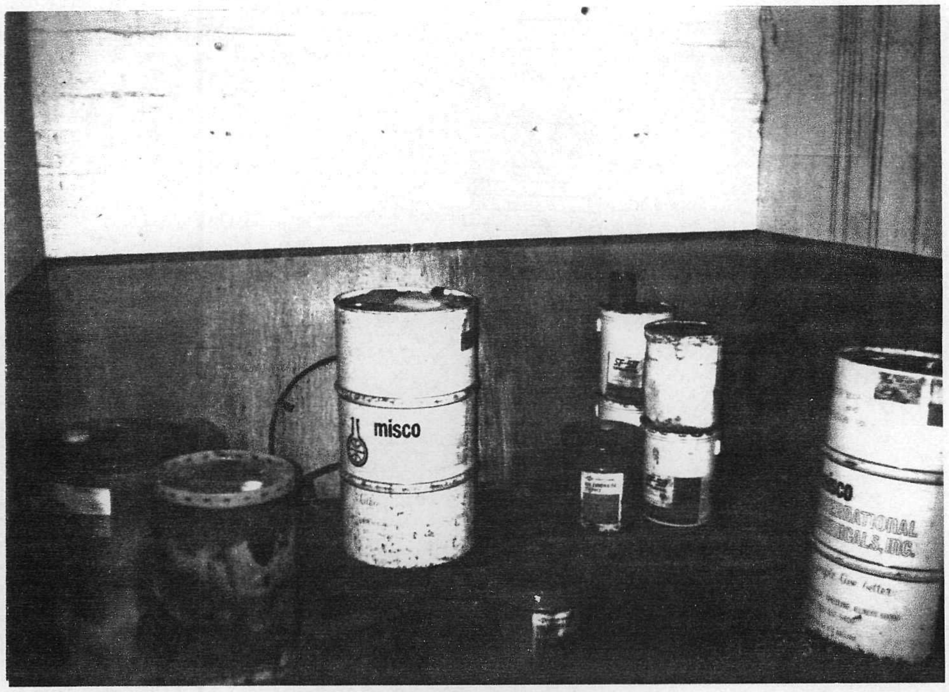
Photograph No. 76 Location: Building 12
Orientation: East Date: 07/23/91
Description: This picture shows three pits located at the west end of the basement of Building 12. The pits are of unknown depth and contained a dark orange liquid. This picture was taken near a room containing spilled oil and several nonoperational transformers; therefore, the liquid may contain PCBs. Note the white debris on the floor.



Photograph No. 77 Location: Building 12
Orientation: North Date: 07/23/91
Description: This picture shows two of three nonoperational transformers in a small room at the west end of the basement of Building 12. The floor of this room was pooled with oil (that may contain PCBs) and piping insulation (that may contain asbestos).



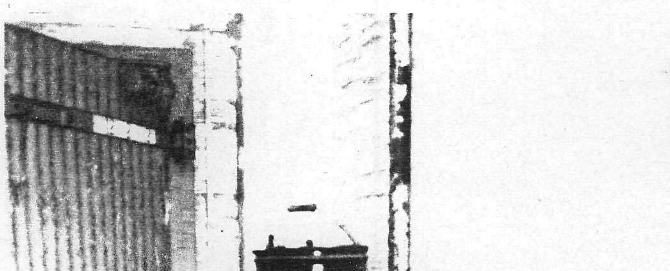
Photograph No. 78 Location: Building 13
Orientation: West Date: 07/23/91
Description: This picture shows a full drum located in the basement of Building 13. The drum was sealed, and no headspace readings were taken with the PID.



Photograph No. 79 Location: Building 14-A
Orientation: South Date: 07/23/91
Description: This picture shows a small room located in the basement of Building 14-A. The containers included two 40-gallon, three 30-gallon, and six 5-gallon pails of maintenance supplies. The exact nature of the contents of the pails was not investigated because the floor was pooled several inches deep with an unknown liquid.

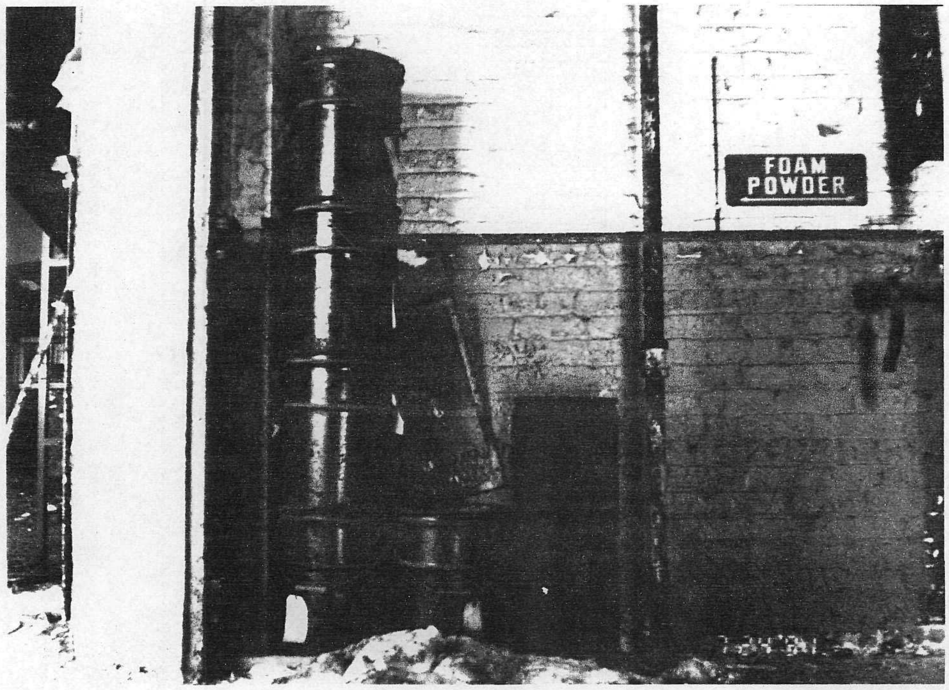
Photograph No. 80 Location: Building 14
Orientation: West Date: 07/23/91
Description: This picture shows a pit located at the west end of the basement in Building 14. The Goodwill representative stated that the pole in the pit was at least 15 feet long and did not touch the bottom of the pit. The pit was full of an unknown liquid and may be an underground tank.

Photograph No. 81 Location: Building 13
Orientation: West Date: 07/24/91
Description: This picture shows the second floor of Building 13. This area contained office space when the facility was operational. A fire that occurred after the facility stopped operations destroyed a large portion of this area.

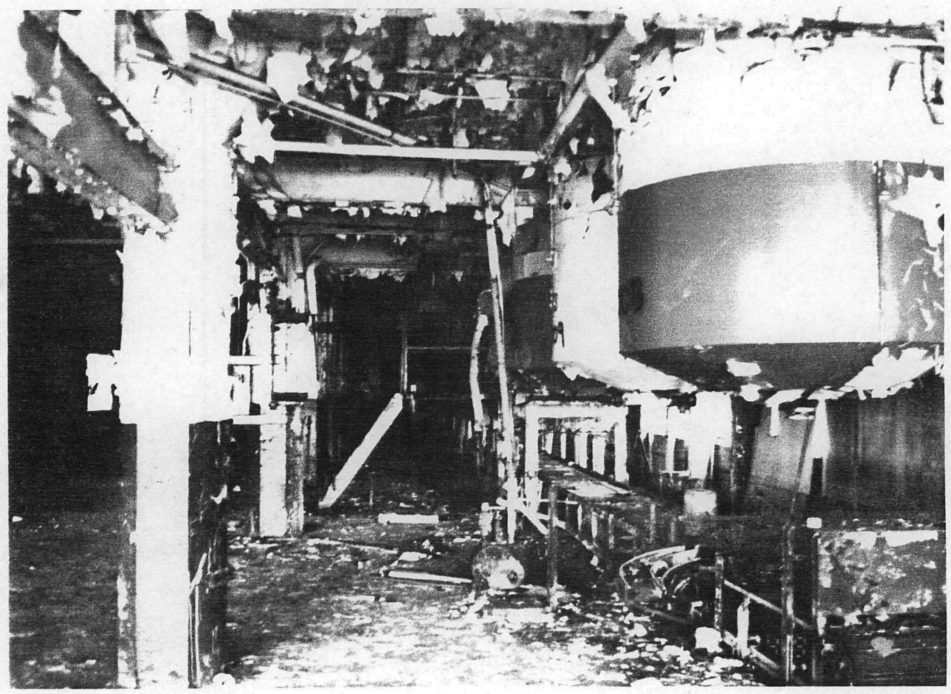


Photograph No. 82
Location: Building 14
Orientation: South
Date: 07/24/91
Description:

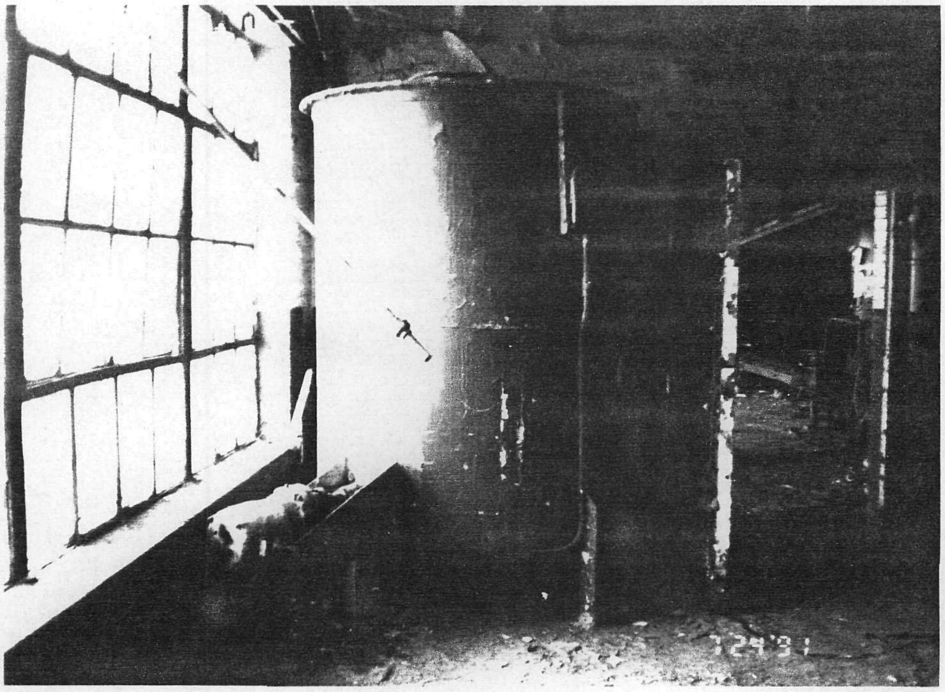
This picture shows eight 5-gallon buckets containing gray powder. The buckets are labelled "Chemical Foam Generator Powder." This picture was taken on the second floor stairwell north of Building 14.



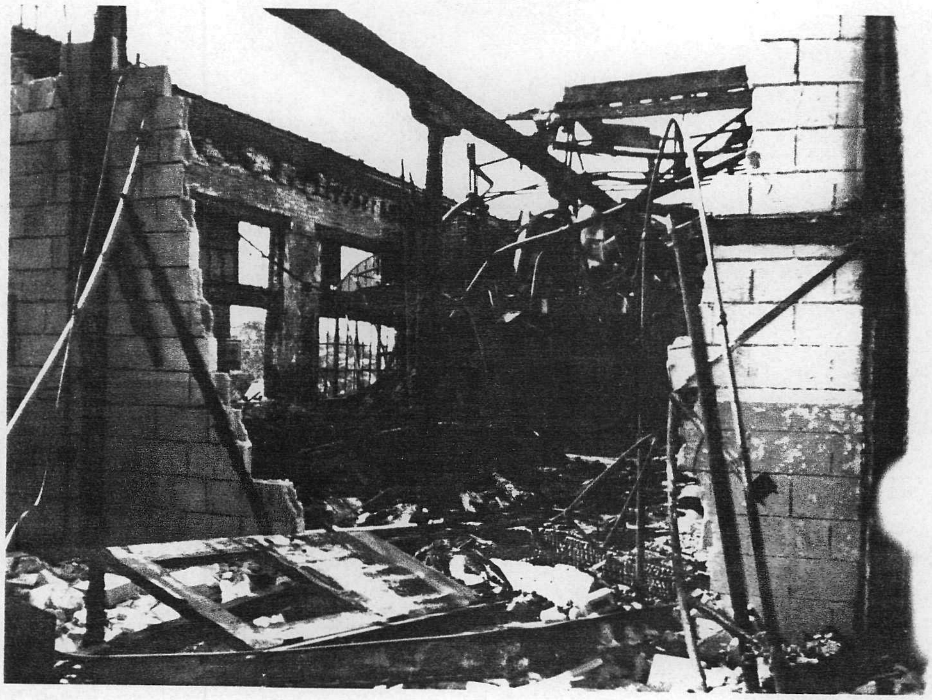
Photograph No. 83 Location: Building 12
Orientation: West Date: 07/24/91
Description: This picture shows seven 5-gallon buckets containing gray powder. The buckets are labelled "Chemical Foam Generator Powder." This picture was taken on the third floor stairwell north of Building 12.



Photograph No. 84 Location: Building 12
Orientation: West Date: 07/24/91
Description: This picture shows a row of tanks along the north wall of the third floor in Building 12. The tanks are numbered from east to west, beginning with Tank 8 and ending with Tank 28. Note the peeling paint and the small, wet areas in front of the tanks. By knocking on the tanks, PRC determined that some of these tanks may be partially full. Other tanks were obviously empty. Some of these tanks were leaking from their fill pipes.

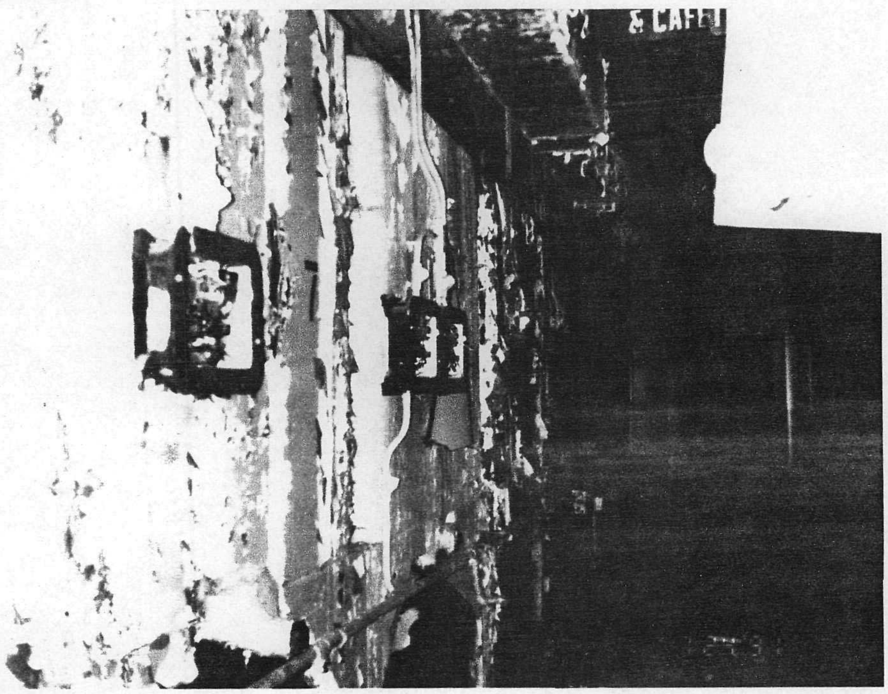


Photograph No. 85 Location: Building 12
Orientation: West Date: 07/24/91
Description: This picture shows Tank 29, which is located on the third floor of Building 12. Note the debris on the floor.

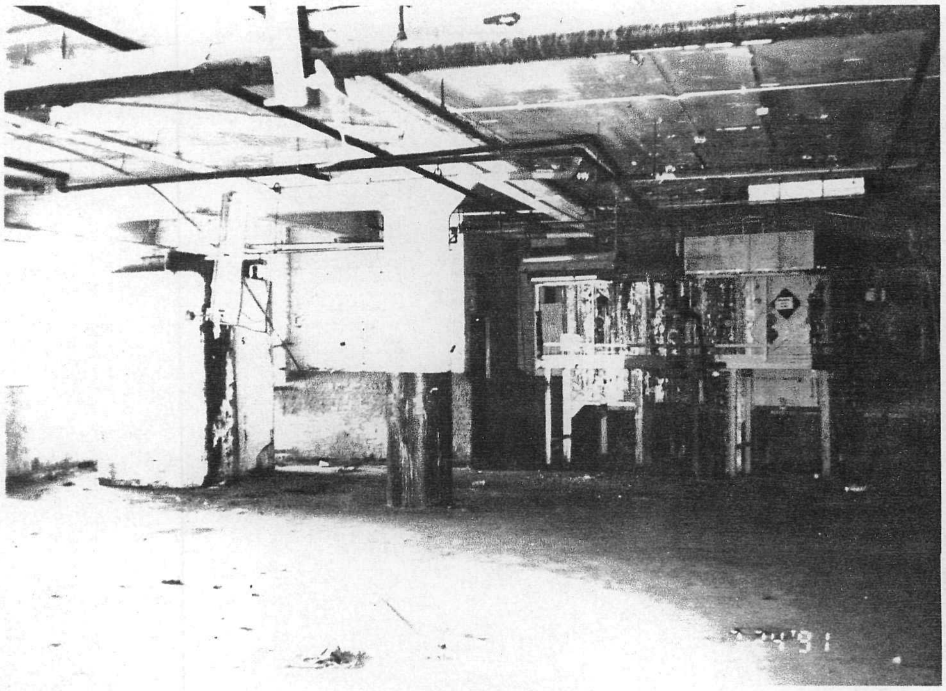


Photograph No. 86 Location: Building 13
Orientation: South Date: 07/24/91
Description: This picture was taken from the third floor of Building 12. It shows the burned portion of the third floor of Buildings 13 and 13-A. PRC did not investigate this floor of the building because of safety concerns.

Photograph No. 87 Location: Building 7
Orientation: West Date: 07/24/91
Description: This picture shows a number of tanks on the third floor of Building 7. This room contains tanks numbered from 30 to 49. Three tanks have been cut open and emptied (Tanks 41, 42, and 48). A number of these tanks contain a thick paint residue. Many of the paint tank lids have small, solidified paint stalactites hanging from them (center of picture).



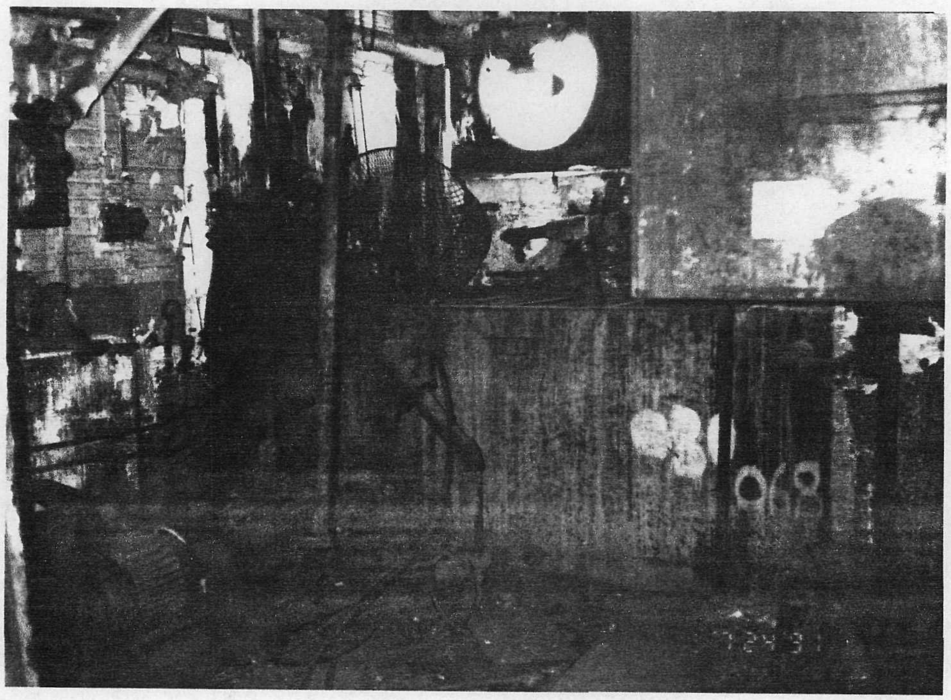
Photograph No. 88 Location: Building 8
Orientation: West Date: 07/24/91
Description: This picture shows a number of the tanks along the south wall of the third floor in Building 8. These tanks are numbered from 50 to 62. Piping insulation observed in this room may contain asbestos.



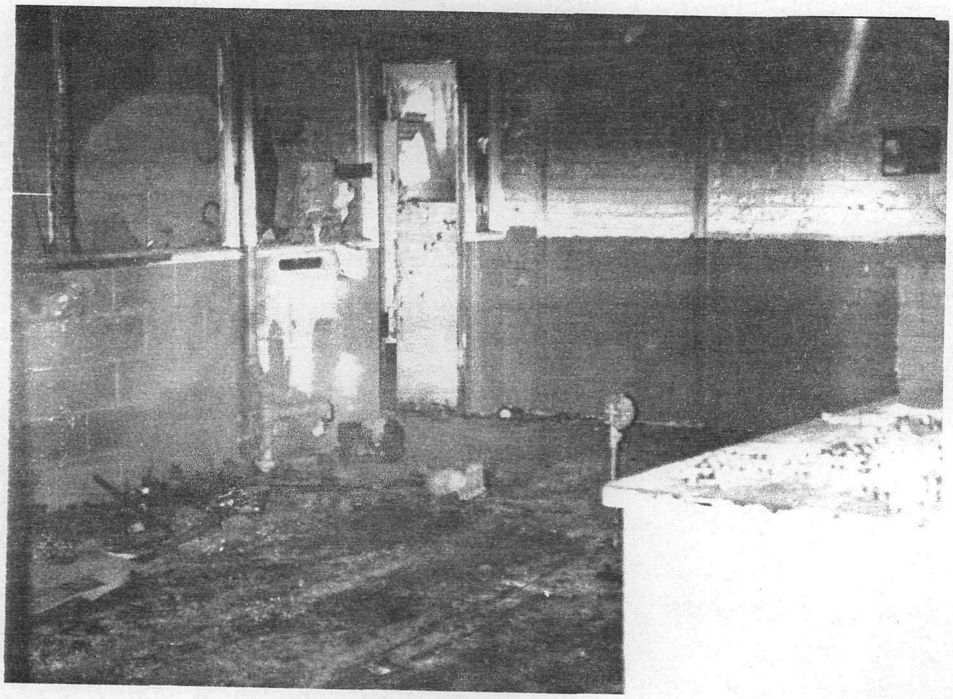
Photograph No. 89 Location: Building 8
Orientation: West Date: 07/24/91
Description: This picture shows tanks numbered from 63 to 67. These tanks are located on the third floor of Building 8 along the west wall. Note the piping along the ceiling of this room. The piping insulation may contain asbestos.

Photograph No. 90 Location: Building 8
Orientation: Northeast Date: 07/24/91
Description: This picture shows a small room in the northeast corner of the third floor in Building 8. PRC believes that this area contained office space. Note the graffiti, the mattress, and the two beverage containers. Based on this evidence, PRC believes that someone uses this room as a living space. Another mattress and some clothing were observed in a small room behind the photographer.

Photograph No. 91 Location: Building 12
Orientation: Southwest Date: 07/24/91
Description: This picture shows the fourth floor of Building 12. Note the various colored paints that have stained the floor in this room. Also note the piping insulation in the right background. The insulation may contain asbestos. The floor in this building was covered with dust and debris.



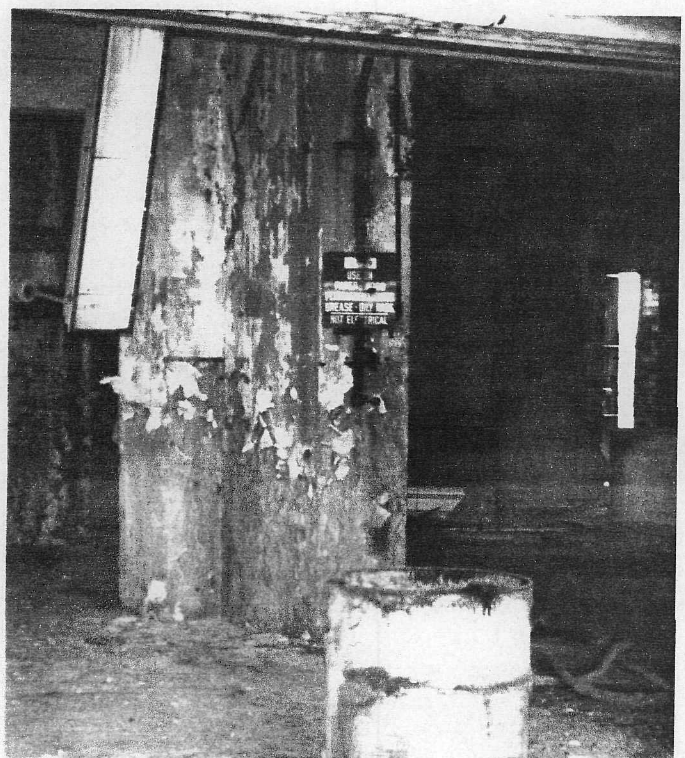
Photograph No. 92 Location: Building 12
Orientation: South Date: 07/24/91
Description: This picture shows Tank 68, located on the fourth floor of Building 12. This tank may have been a parts washer.



Photograph No. 93
Orientation: Southwest

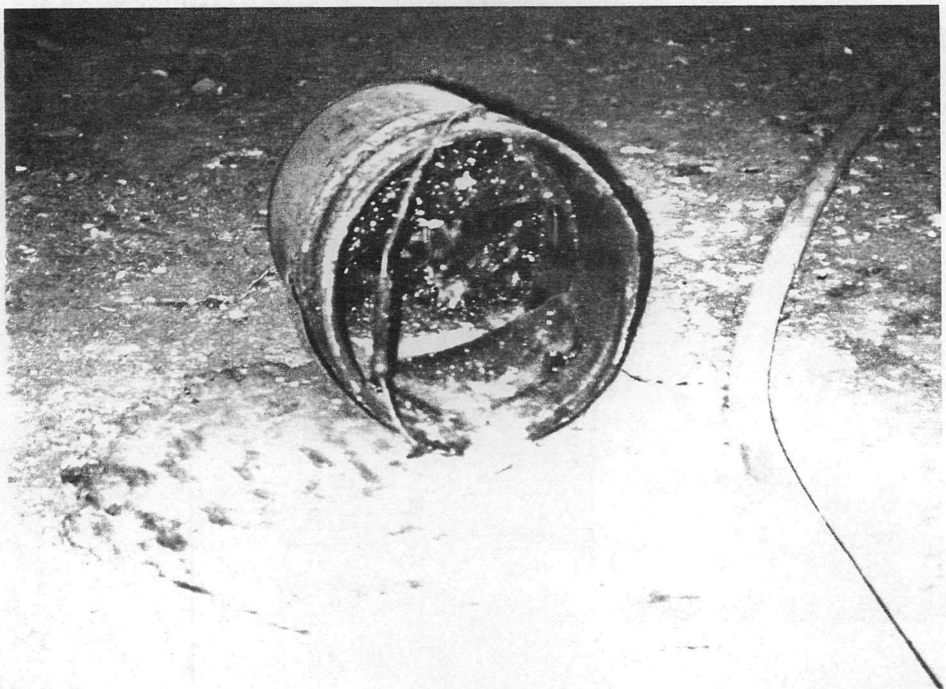
Location: Building 8
Date: 07/24/91

Description: This picture shows the charred remains of a portion of the building labelled "Chemical Lab." The laboratory area was apparently located throughout the fourth floor of Building 8 and showed evidence that it had been burned at some time. Note the smoke line along the wall in the background.

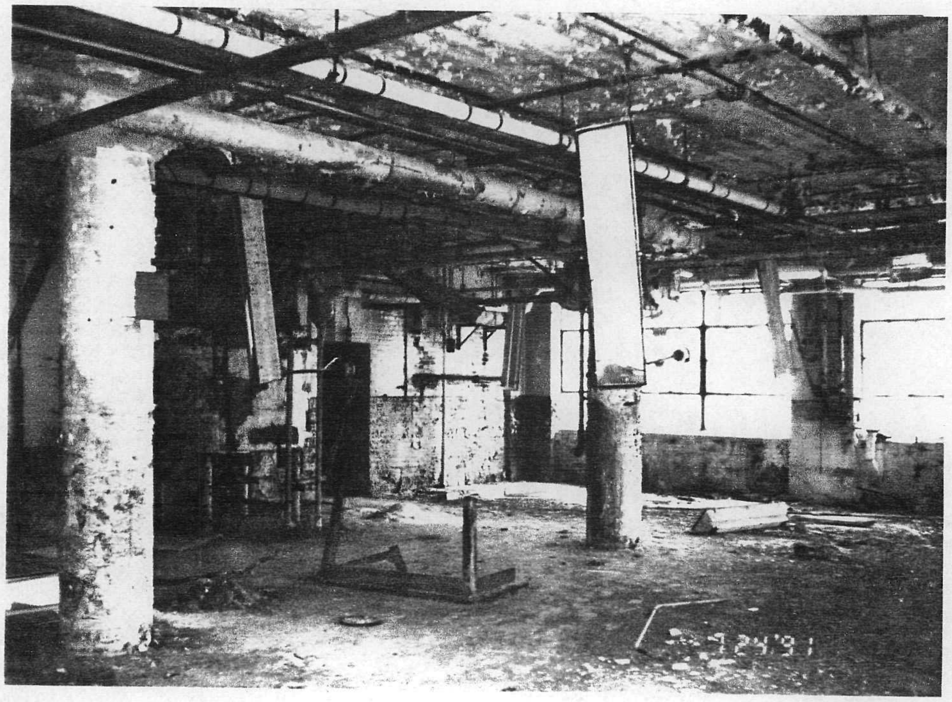


Photograph No. 94
Location: Building 12
Orientation: Northeast
Date: 07/24/91
Description:

This picture shows a partially full drum of a yellow substance that appeared to be resin. This picture was taken on the fifth floor of Building 12. Note that the yellow substance has oozed from the top of the open drum onto the floor. Also note the dust on the floor and the peeling paint on the walls.



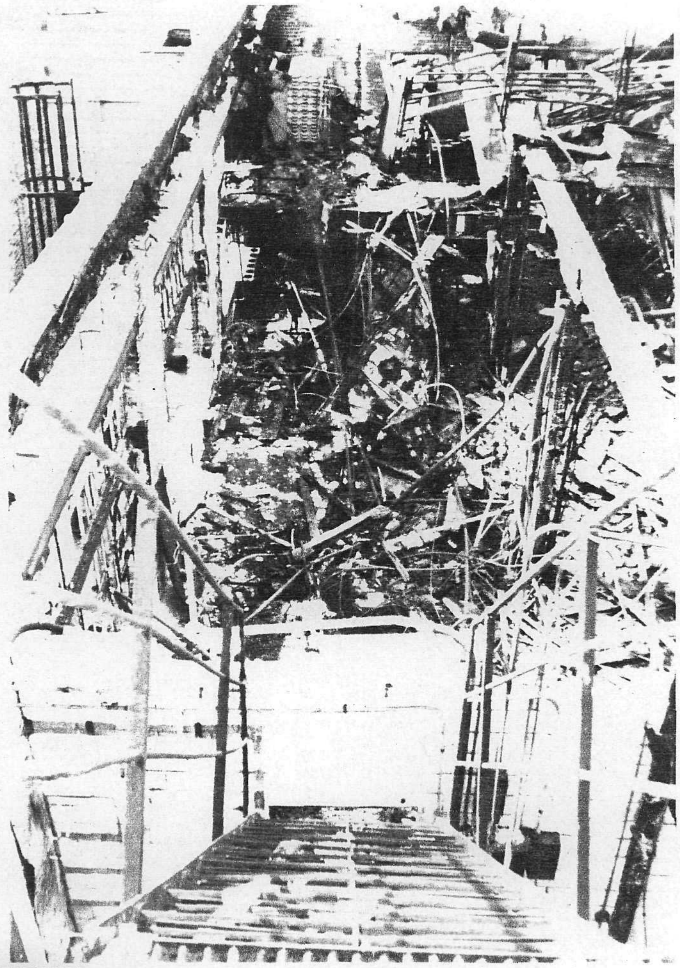
Photograph No. 95 Location: Building 12
Orientation: East Date: 07/24/91
Description: This picture shows a spilled bucket of an orange, resinous substance. The picture was taken on the fifth floor of Building 12.

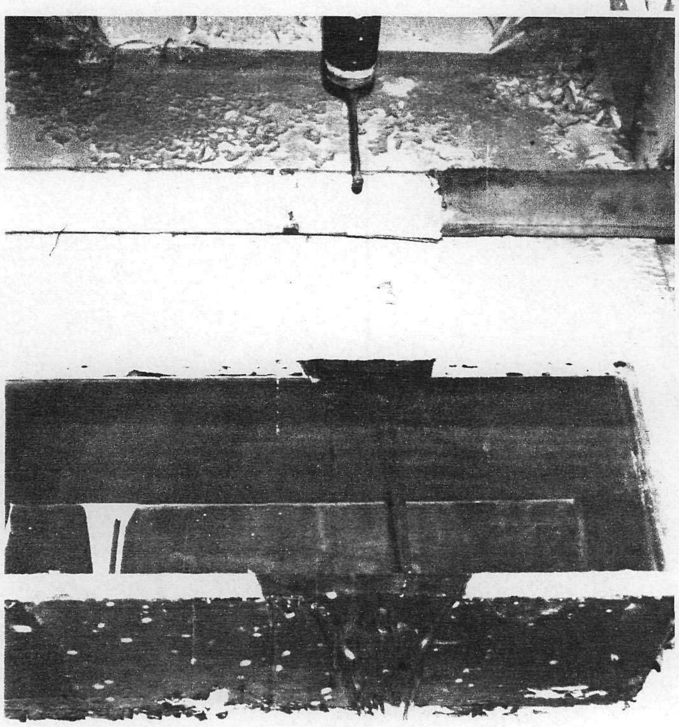


Photograph No. 96 Location: Building 12
Orientation: Northeast Date: 07/24/91
Description: This picture shows Tank 69 in the left background. The picture was taken on the fifth floor of Building 12. Note the white powder on the floors and the peeling paint on the walls and ceiling in this area. Tanks 70 and 71 are located to the left of Tank 69. Based on small holes in the floor, it is likely that other tanks were once in place in this room. Note the sign in the right part of the picture labelled "NOTICE: Respirators Required." This may indicate that this area was used to mix paints.

Photograph No. 97
Location: Building 13
Orientation: South
Date: 07/24/91
Description:

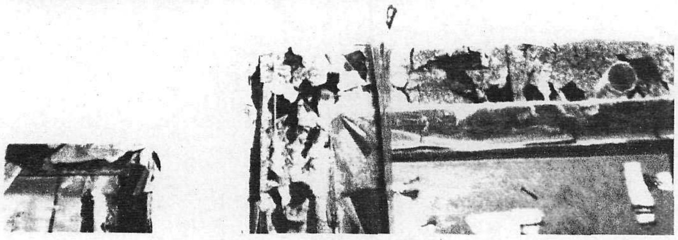
This picture shows the charred remains of the third floor of Building 13. The picture was taken from the fifth floor of Building 12.

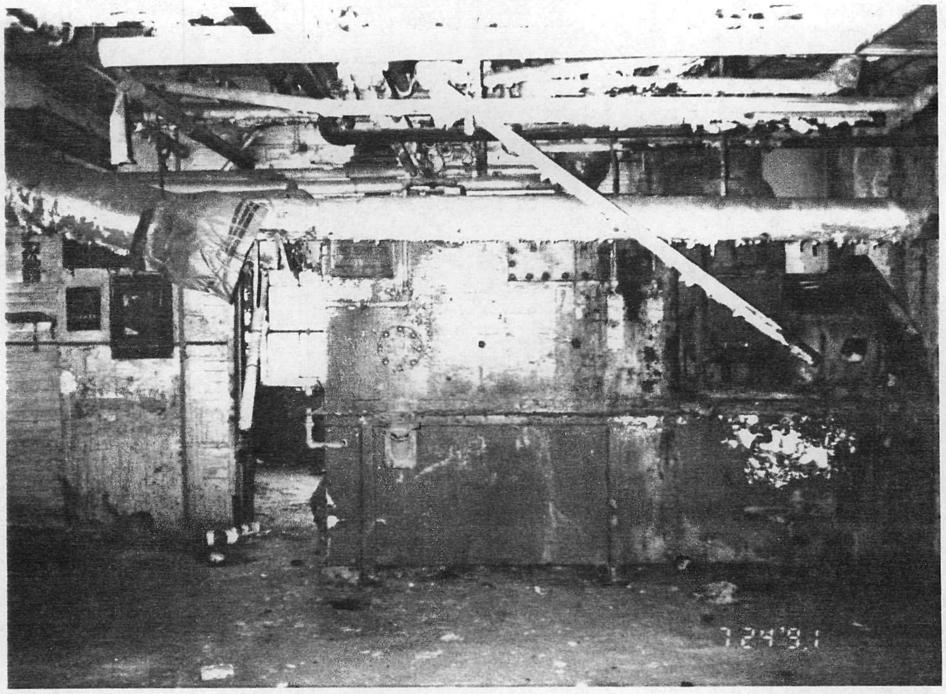




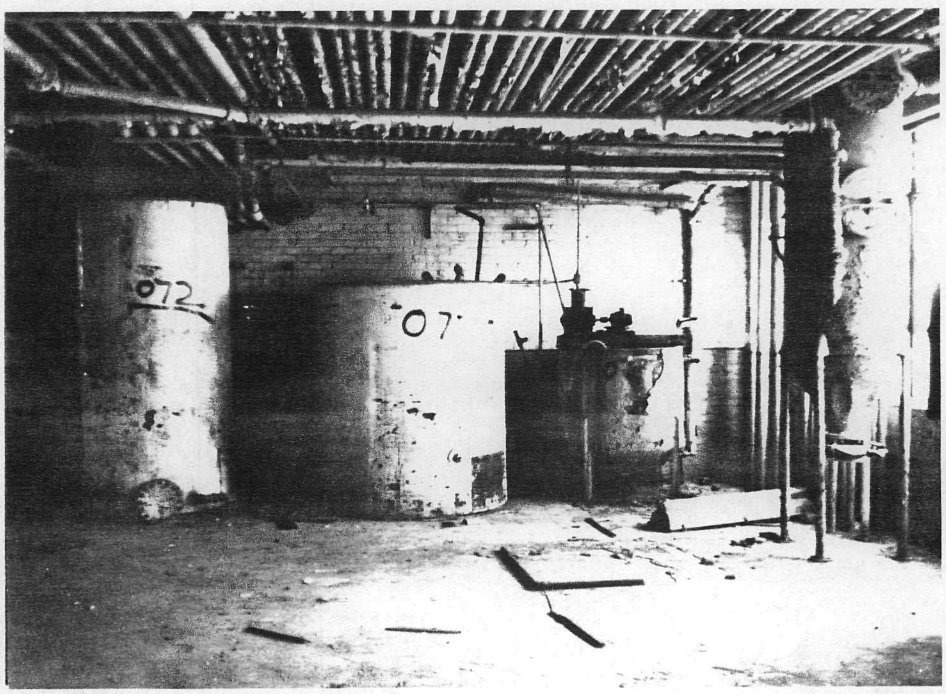
Photograph No. 98
Location: Building 12
Orientation: South
Date: 07/24/91
Description:

This picture shows a pipe dripping an orange-colored, resinous substance. The picture was taken on the fifth floor of Building 12. Note how viscous the substance is. Also note the piping insulation in the upper part of the picture. It may contain asbestos.

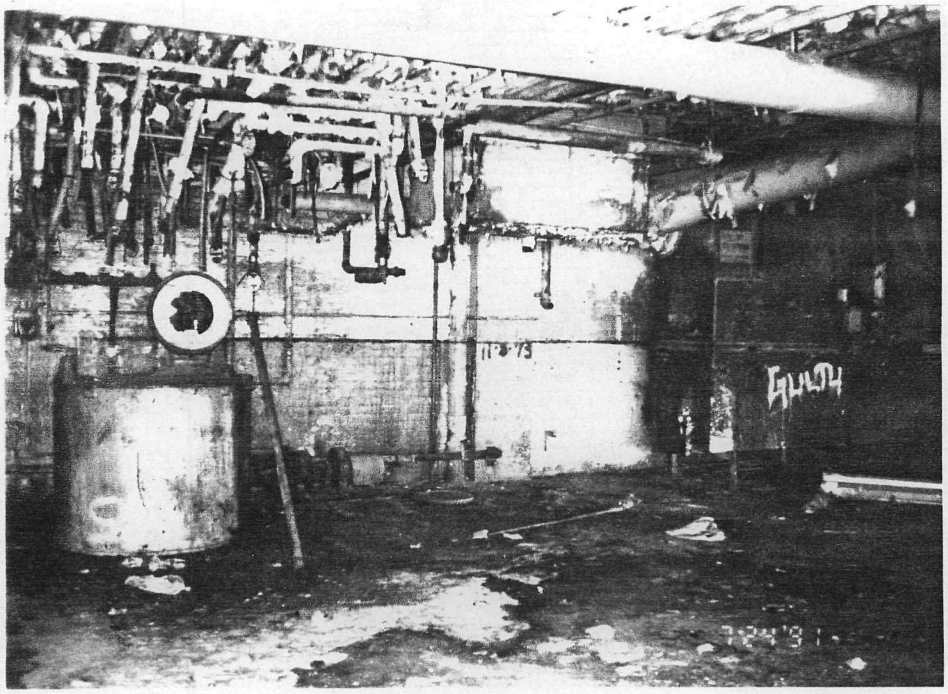




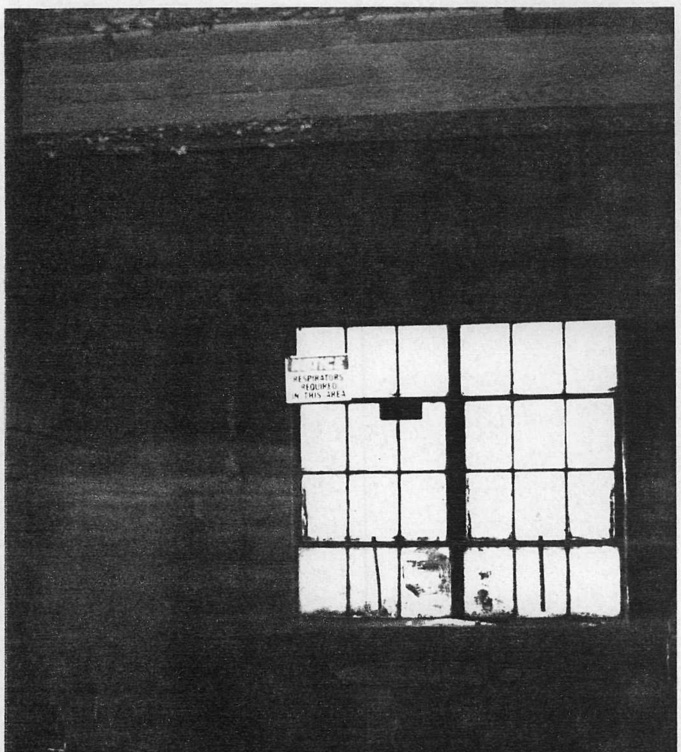
Photograph No. 99 Location: Building 12
Orientation: South Date: 07/24/91
Description: This picture shows a dust suppressor located on the fifth floor of Building 12. The area shown in Photograph No. 98 is located to the left of the dust suppressor and can be seen in this photograph as well. Note the insulation on the pipes running along the ceiling. It may contain asbestos. Piping insulation was also seen on the floor. In the background is a small room that was probably used for storage. Small warning labels containing the words "Caution - Contains Lead" were observed in this room.



Photograph No. 100 Location: Building 7
Orientation: East Date: 07/24/91
Description: This picture shows Tanks 72, 73, and 74. The larger, upright tank to the right of Tank 74 was not labelled. The picture was taken on the fifth floor of Building 7. Because holes in the fifth floor opened directly into existing ball mills on the fourth floor, PRC believes that this room was used as a primary mixing area.



Photograph No. 101 Location: Building 7
Orientation: North Date: 07/24/91
Description: This picture shows Tank 75 and a dust suppressor located on the fifth floor of Building 7. Tank 75 is resting on a scale. Based on the location of the scale relative to the cut and drained pipes visible at the upper left, PRC believes that this area was used to measure out the ingredients of paint batches. Note the stains and debris on the floor.

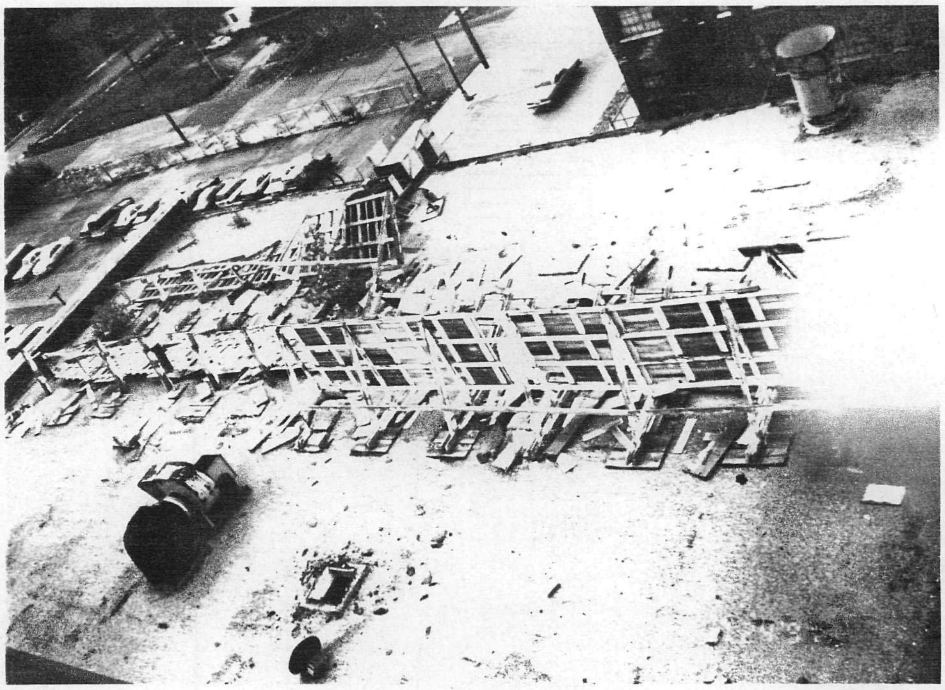


Photograph No. 102
Location: Building 8
Orientation: South
Date: 07/24/91
Description:

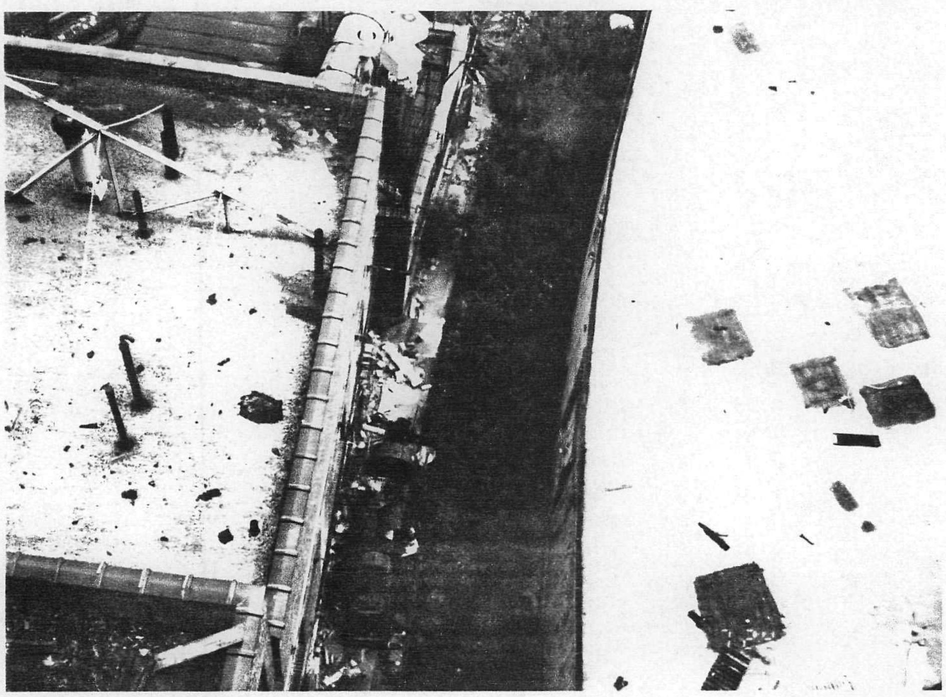
This picture shows an open-topped tank located in the southwest corner of the fifth floor in Building 8. Note the sign in the center of the picture. This may indicate that this area was used to measure out powders or solvents for paint batches. The tank was filled with miscellaneous solid debris such as wood.

Photograph No. 103 | Location: Building 8
Orientation: North | Date: 07/24/91
Description: This picture shows a general overview of the fifth floor of Building 8. Note the peeling paint and the graffiti on the wall in the background. Based on the clean appearance of this room, PRC believes that it was used for raw material storage.

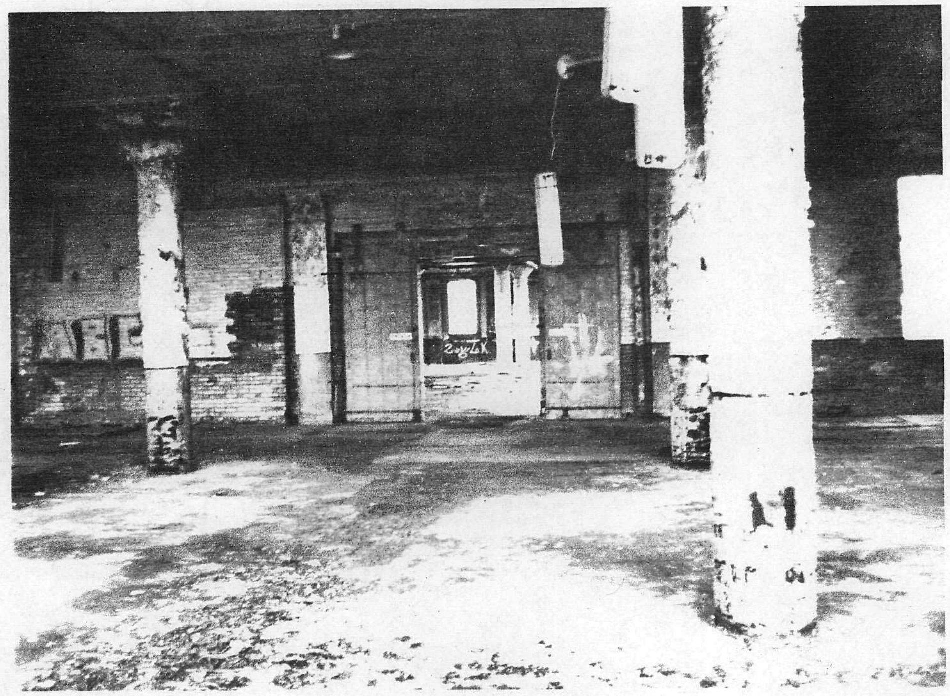
Photograph No. 104 | Location: Building 12
Orientation: East | Date: 07/24/91
Description: This picture shows the eastern part of Building 12's sixth floor. A great deal of fire damage was visible in this room, especially in the northern part. Based on the number of file cabinets in this area, PRC believes that it was used for office space.



Photograph No. 105 Location: Building 14
Orientation: South Date: 07/24/91
Description: This picture shows the roof of Building 14 as seen from the penthouse on top of the facility. The racks that are visible were probably used by paint manufacturers to test various paints.



Photograph No. 106 Location: Buildings 7 and 11
Orientation: North Date: 07/24/91
Description: This picture was taken from the roof of the facility. It shows the railroad tracks running between Buildings 7 and 11. Note the piece of red equipment on the concrete area near the middle of the picture. This equipment may have been part of the boiler system at one time. The boiler room is located at the very top center of the picture.



Photograph No. 107 Location: Building 7
Orientation: North Date: 07/24/91
Description: This picture shows the general layout of the sixth floor of Building 7 and a small portion of Building 8, seen through the doorway in the middle of the picture. Note the damp areas on the floor. Also note the graffiti on the walls, indicating that unauthorized persons have gained access to the facility.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

GOODWILL INDUSTRIES

CHICAGO, IL 7/23/91

1000 MIKE QUINN, BILL STEWART, LEO STERN (REP. VALSPAR)
LEO & MIKE REPRESENT ATTY'S FOR VALSPAR. ARRIVE

T= 80°F, WIND 5-10 KNOTS
SUNNY, NO CLOUDS

S. ARMSTRONG INDUSTRIES
E. PARKING LOT ACROSS KILBOURN
W.
N.

1025 Bill Chamberlain (Chicago) arrives
Jerry Scheibe let us in when he arrived

1041 Goodwill arrives (Russ Selman (their atty) and Jim Wadsworth. Access agreements are signed by all.

FROM P. 21

1052 Pt. Mfg Area. Filling room (VSI-1, 2, 3) Tacky substance on floor in bldg VSI-1, It is black. PIC 8 E. VSI-1

VSI-2 was used for filling/blending. VSI-1 filling. They point out that all info is best guess

PIC 9 - VSI-2 E. Looking into VSI-1

1059 VSI-4 Small room cluttered w/ trash PIC 10 E.

Process lines near VSI-4 PIC 11 N. View of lines near VSI-4

Drain in area near VSI-4 we call VSI-5 has paint spillage running into it. Neither GW near VS know where the ~~sewer~~ leach line drainage goes to. PIC 12 W.

A number of resin and paint trails are located over the asphalt paving here.

A couple of latex drums near Bldg 25. PIC 13 N.

Inside Bldg 25 N (PIC 14) Bill says it was probably drum storage. Again, don't know Wooden pallets. Couple of metal racks w/ stains (linseed oil ?) 0 ppm

1110 Any lines to Armstrong were cut
when they left the place.

Bldg 15B: PIC 15 N View
of floor. Around to other side
of bldg. Looks like concrete.
Bill says it has to be to
support the tanks. Door on
west side of 15B has drops onto
tracks outdoors. These are resin
tanks (#235 - #239)
PIC 16 W. Out to tracks
PIC 17 E. From door
PIC 18 E. Pool of resin in
room.

1121 Pipes appear to run along tracks
underground to Armstrong. They've
all been cut, apparently. So
no longer in use.
PIC 19 S. Manholes leading
down to lines.

VSI-7. Cut piping has leached
to ground. PIC 20 W

Bldg 15-A. Appears to be
a warehouse. PIC 21 SE

Bldg 15 was open front shuttle
area. Paint on ground along
tracks. PIC 22 Wasted
PIC 23 S. Tracks to Armstr

Bottom of Bldg 15 - Inside
Pipes and lines - many still
insulated w/ asbestos
PIC 24 E PIC 25 Floor E

1133 Top part of Bldg 15
PIC ~~27~~ 26 KV SW PIC ~~28~~ 27 KV SE.

1136 Bldg 3. Lot of tanks
(# 20_ - 215)
PIC ~~29~~ 28 KV E Into a varnish
filter where a resin tank (?)
~~They~~ KV Bill says its varnish
(Tank 214)

Trench on floor, where use.
PIC 30 N.

On west side of Bldg 3, T# 210-213
have some resin drips - shiny dark
mat'l. Still tack

PIC 30 S. Drippage - one piz
is gone

18.

PIC 31 S. View of part
of Room 3-B.

PIC 32 Up. PIC 33 down Both N
Asbestos' piping ins

Note the N-S pit in PIC 31.
Room has light resin color.
Pit has Open. Maybe PB ???
tanks - hard to tell

Floor is grated. Don't know
where it goes

PIC 34 E. Floor grating.

1153 Bldg 3.T. Transformers.
sticky floor Oil pooled
around one of them

09.

Asbestos also in this room

PIC 35 NE. puddles on floor.

Bldg 3-F. Old maintenance shop.
Nothing of note. Used PPE
stored here. One bucket of
what looks to be oil here.
Room is trenched all around.

PIC 36 N. Can of oil. ~~Sump~~ [illegible]

Sump @ N end of room connected
to trenches through piping. Sump
partially full of liquid

PIC 37 W. Drain into sump

1205 S Tank area, N. Tank Area
Runs along side of Armstrong.

PIC 1 (New roll 2) S. View
of S Tank Area

PIC 2 N. N. Tank area. Fill
pipes on left. Manways
on rt. This is West
of farm.

PIC 3 E. No vegetation under
lines in N Tank area

Both farms are bermed

W end of site. Fill and
trash. Const. Debris & foundation
of old Bldg PIC 4 N

PIC 5 NE. View of munitz facility 1231

Russ Selman states that Armstrong uses some of the tanks. B. N says that after acquisition, there was no sharing of tanks. Selman says he thinks this area ~ West of bldg 3, 3B are tank farms

VSI-8. Likely 2 solvent storage tanks
PIC 6. VSI-8 NW (# 295-96)

This area used to be a bldg. There are raceways along the concrete areas

62

On S side of Coopers Pit area. Two square holes, underneath is a manway. (old tanks?)

PIC 8 Down W into one of pits (VSI-9)

PIC 9 N. Into Coopers Pit. Roofed area, Plywood on floor near tank entrance

PIC 10 N. under pipelines on W. side of Coopers Pit. Looks like resin drops

PIC 11 N. Grand view. Grand is resinous, deep, squishy, and oozes when pressure is applied. -92

1241 Back of Cooper's pit. One of the tank holes is full of H_2O/liquid. Area littered w/ drum bungs and gaskets. PIC 11 down West.

PIC 12 N. Room 7-B. Drums are MT. Note trends

Bldg 7 PIC 13 E. Feces on ground. Graffiti on wall - people have been in here. There is a hole of latex. Something leaking out of it. Along N wall

PIC 14 E. View of hole.

1251 Everyone except Jerry took off while we were @ Solar Storage Tanks. Break for drink.

1310 Bldg VSI 1, 2, 3. Top floor

VSI-3 Top floor - MT.

VSI-2 - Room w/ heavy sealing door. PIC 15 N. Storage racks, some dark, wet-looking stains on floor

VSI-1 MT, except for trash. Note paint chipping off everywhere

VSI-3 has an asbestos pipe PIC 16 S

VSI-3 1st floor 7-L #240 Old PPE bags ripped open, (by vagrants?) Strip along N wall is covered by sheet metal.

PIC 17 SE

SL

HL

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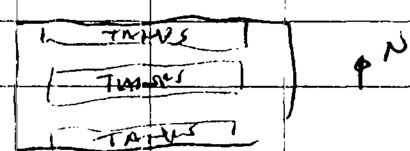
1320 Bldg 6. Tanks here. Some PPE!
PIC 18 Tanks cut open. These
have obviously been cleaned out.
Tanks # 94-135 stripped
PIC 19 (W) View of resin
stalactite. Jerry says it breaks
off every winter and grows out every
summer.

1326 Bldg 6A. Tanks 91-93 on platform
Resin on floor. PIC 20 S.
PIC 21 W.

Back in Bldg 6. W. aisle. Resin



stalactites, puddles, etc.

1332 Bldg 5A 2 floors. 2 small
tanks, 3 big ones
PIC 22 N

Bldg 5B 2 Tanks PIC 23 N.

Bldg 5D K.V. S Wall torn down
1 AST down. Misc.
trash outside 5C

Bldg 5C. Water-filled Pits
2-3' deep based on entrance
198-205. PIC 24 N.
Tanks extend to ceiling

1341 Bldg 5E. Pit w/ some foam
liquids. Slight smell of
solvent. Definitely resins
PIC 25 N.

1344 Bldg 5R One drum. MT[ip] >5000 ppm in headspace. Tim checking drum in Level C. Breathing zone is >20 ppm. Over drum ~500 ppm. Drum completely full of liquid. Drum outside Bldg is solid ~26.5 ppm inside drum. PIC 1 N. Outside. PIC 2 N. Inside. [New roll]

1352 5E Upstairs Broken porcelain (toilets misc. trash. fiberglass insulation

1357 Bldg 9A (down half flight of stairs) Old boiler room PIC 3 W. Note - one MT [illegible] here

1359 Bldg 9C. Also a boiler room There is oil in gravel @ W end of bldg PIC 4 W

In low area between boilers ~~Strong~~ [illegible] Odor of hydrocarbons. Oil on floor. PIC 5 W Note paint tank at left & oil on floor Oily stains - walls. Some asbestos piping

1403 Bldg 9. Oil here and there 2 bbls of unknown contents Engine has a trench under it. full of liquid - rusty colored PIC 6 NE. trench w/ power [illegible]

Heavy machinery

Bldg 8. Floor 1. 6 drums Drum 1418
1 HS - 0ppm #2 760ppm
#3 - 0ppm #4 - 0ppm #5ppm
PIC 7 NE

White dust on floor. One drum
on side away from Alm S.
These are near entrance @ E
side.

1 drum away from others has
leaked, HS = 5ppm. PIC 8 NE

Gang-related graffiti on walls
Room @ SW corner has a drain
w/ a parts washer, crystallized
mat'l on floor near drain. Don't
know where drain goes PIC 9 W

1433

In NE area - generator
room 8A. Single drum @ W
has 0ppm. 2 more near SW
corner 0.2ppm & 50ppm. Drum
on N wall was
2 more near NE corner ~ 110ppm
& about 1.8. Note that this
room is @ 2.0 ppm approx
1 generator pit has H_2O - it
in some other l.g.
PIC 10, 11 E (BBl. on N wall
pit under gen.) PIC 12 N
Bbl in NW corner. PIC 13
SW. Bbls in SW corner

Bldg 10-B 3 paint tanks, 1 drum
Tanks along S wall. Drum near
corner of Bldg 10 (3 ppm)
PIC 14 S, PIC 15 SW. Notice
wet floor.

1435 Bldg 10. 4 large tanks
Stairs under tanks. Knock
sounds hollow. May be still
in bottom (#1-4) PIC 16 W.
4 tanks in background. Oil stains
and powder on floors

1438 Bldg 11. Pits here. Jerry says
that these and the ones in
Bldg 10 complex are tanks into
basement. Might be able to
view them. PIC 17 W.

Some sort of oil transfer tank,
according to Jerry. He's not
sure. It is a large tank labelled
w/ Valspar name ~20 gal tank
PIC 18 S

1444 Bldg 12. MT except for
some debris

Into basement, N end, near
bldg 10. Trench along ground
near W wall, running N-S
Full of water w/ yellow deposits

PIC 19 N

The N portion of this room is
walled off - A peephole shows
tanks beyond PIC 20 N

1453 Bldg 11. Divided into ~~two~~ three
areas. The E area has
4 ~ 10,000-gal tanks. Residue
dripping from pipes
PIC 21 S PIC 22 E

Ended. Picked up 0.5 ppm -
Nothing here.

1458 Bldg 12. 3 tanks along E
wall (# 77-79) Pic 23 E
Paint pails, rubble @ W end
of Bldg 12. Transformer loc.
back here. Also small holes
in floor filled w/ dark
orange liq Pic 24 E Pic 25 N
of 2 out of 3 transformers. Floor
very dirty w/ oil & asbestos
soaking oil up.

1505 Bldg 13. 1 Full drum Pic 26 W

Pyze runway.

1509 2-40 gal, 3 × 30 gal, 6-5 gal
pails of maintenance equipment
Unknown because of pails -
floor. Pic 27 S. Bldg
14-A.

In W wall of Bldg 14, there
is a pit @ least 15' deep
Pic 28 W

1515 Enough for today. Tomorrow,
meet Jerry here @ 0910.

7-24-91 GOODWILL Day 2

0855 Arrive @ site. Jerry is here.
Co on W side is Liberty
Motor Machine Co (Michael
Margolis 521-4000)

0905 In PPE (Level D). Sunny,
about 80°F, Wind from W 5-10kt.
Clear sky w/ few wispy clouds.

0914 Bldg 13 Floor 2. Burned down
lot of rubble. Some Paint Cans
PIC 25 w/

Bldg 14. MT except for rubble.

In hall/stairs - sign says foam
powder. Points to buckets

8 x 5 gal buckets labelled
"Chemical Foam Generating
Powder" PIC 30 S

0921 3rd Floor Bldg 14. Same as
above entry. Same powder on
floor. PIC 31 W. 7 Pails

In main 3rd floor area. Looks
like fill room. Row of tanks
8-29 (E-W) along N wall.
Assembly line underneath it
Paint chips off ceiling here pretty
indicative of whole plant.
PIC 32 w. Lots of debris on
floor & some sticky dark areas.
Knocking on tanks. Some of
them full. Some have residue
on outsports.

1 Tank in SW corner PIC 33 W

Bldg 13: Burned down PIC 34 S

0930 Bldg 7: Tanks #30-49 Top holes are open on many of them. Lids covered w/ paint stalactites. PIC 35 W Some have been cut open. Obviously in slump. #41, 42, 48

0935 Bldg 8. Tanks #50-62 on S wall PIC 36 W Asbestos piping in walls. #67 in middle of room #63-66 on W wall. PIC 37 W Lot of gang-related graffiti. Change film

0940 NE portion of Bldg 8. Someone prob lives here. Mattress not here

last time Jerry = Bldg PIC 1

0944 Stairs into Floor 4. 4 pails of foam powder.

Bldg 12. PIC 2. Out window to Bldg 7-8. W

Number of downspouts cut off (during mecond?) Floor covered w/ debris & powders PIC 3 SW Note asb. piping Tank #108 on S wall is MT PIC 4 S Dip. tanks taken out Holes for letdown in floor.

0949 Bldg 7. 3 ball mills & a number of letdown tanks that have been removed. PIC 5 SW

Dust suppression and tank on N wall. This was a weigh-ent near PIC 15 N

1016 Bldg 8 MT. Looks like storage area. 1 Tank on SW corner. MT. Sign says rebar required PIC 16 S
PIC 17 N. Overview of room

1019 Bldg 12 Floor la. Lot of fire damage. Looks like office space. One MT Room Opp PIC 18 E.

1024 Penthouse on top of plant. Out window to S are old paint testing racks. PIC 19 SE Residential area across street & across interstate to S.

1027 More test panels here. Water tank located here as well. PIC 20 E. Note residences. PIC 21 N. Boiler room & stack. PIC 22 N. Layout of lower floors. Looking onto tracks.

Bldg 7-7th Rainwater & pad seen in H_2O here. Room MT otherwise. PIC 23 Seed

1033 Bldg 8-7th MT. Some asb insulation on floor. Out W window, Royal Container Box Co. across tracks.

1036 Bldg 8-6th. MT. Same asbestos. Gangs have been here (Latin Kings)

Rainwater has infiltrated and is
dripping onto floor @ seam
between Bldgs 7 & 8

Bldg 7. MT, rubbish, etc.
Some dried algae indicates
ponding here as well.

PIC 25 N. View of 7 into 8.

1042 2nd Floor Bldg 7, 8. Nothing
Lunch room on SW corner
Lots of debris. Looks like more
of the same from above.

1046 Out by cars. Jerry says they've
seen people. A dog on-site today.

1050 Dave & out.

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ATTACHMENT D

PHASE I IDENTIFIED RESPONSE ACTION (Waste Reduction, 1985)

PHASE I

IDENTIFIED RESPONSE ACTION

1330 South Kilbourne Avenue South

Chicago, IL

Prepared for:

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62076

and

The Valspar Corporation
1101 Third Street South
Minneapolis, MN 55440

PHASE I

IDENTIFIED RESPONSE ACTION

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Prepared for:

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62076

and

The Valspar Corporation
1101 Third Street South
Minneapolis, MN 55440

Prepared by:

James A. Kinsey
Waste Reduction
5367 Eagle Street
White Bear Lake, MN 55110

October 23, 1985

PREFACE

This Identified Response Action and every portion thereof is made and presented as an accommodation to the Illinois Environmental protection Agency and presented as an offer to compromise a disputed claim within the meaning and intent of rule 408 of the Federal Rules of Civil Procedure. The Illinois Environmental Protection Agency's acceptance and use of this Response is an acknowledgement of its status as an offer to compromise a disputed claim within the meaning and intent of Rule 408 of the Federal Rules of Civil Procedure. Should the Illinois Environmental Protection Agency decline to make such an acknowledgement, this Response should be returned to The Valspar Corporation without further review or use by the Illinois Environmental Protection Agency.

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TABLES

APPENDICES

1.0 PURPOSE AND SCOPE

This report has been prepared in response to an Illinois Environmental Protection Agency (IEPA) "Notice to Parties Liable for a Release or Substantial Threat of a Release of a Hazardous Substance" dated July 16, 1985 pertaining to the facility at 1330 Kilbourne Ave., Chicago, IL, which was owned and occupied by Goodwill Industries and which had been operated as a paint manufacturing plant by the Valspar Corp. for the eight years prior to August 1984. A copy of this notice is presented in Appendix 1. The Valspar Corporation has provided necessary personnel, materials and services necessary to comply with the first phase of the stipulated response actions. These Phase I activities have included:

- Characterization (including laboratory analysis and hazard determination) and quantification of residues in above and below ground containers at the site;
- Characterization of residues on floors both inside and outside of building structures;
- Analysis of peeling paint to determine the presence of lead, cadmium and chromium;
- Evaluation of data to establish proper treatment and/or disposal of hazardous residues found in storage tanks (above and below ground) process tanks and piping; and
- Recommendation of a specific plan for removal of hazardous residues.

The data collected and evaluated as part of the Phase I work will serve as the basis for Phase II work, which will include the physical removal, transport and treatment/disposal of hazardous residues remaining at the site.

2.0 BACKGROUND

Since the turn of the century, the 1330 Kilbourne Avenue site has been used as a paint manufacturing facility. The original occupant was Armstrong Paint. This entity was purchased by Elliot Paint. In November of 1976 The Valspar Corporation purchased the stock of Elliot paint. Thereafter, it leased the property on which the facility was situated from a trust established for the benefit of the former owners of Elliot Paint. A wide range of coatings have been manufactured there, including paints, varnishes, stains, and roofing products.

The Valspar Corporation ceased all manufacturing operations at the 1330 Kilbourne site and terminated its lease of the property on October 31, 1984. The property was then donated by the owners to Goodwill Industries, Inc. This donation included the land, buildings, equipment, and materials left at the site. Goodwill Industries hired B and K Salvage to recover and sell useable materials. B and K Salvage removed fuel oil from a tank leased to American Cyanamide but did not recover any of the clean mineral spirits.

Circumstances leading up to this IEPA Response Action stem from an IEPA inspection of the 1330 Kilbourne Ave. site in conjunction with the closure of hazardous waste storage facility on the site. The Valspar Corporation, in accordance with state and federal hazardous waste rules, operated a permitted facility for the storage of hazardous wastes generated on-site. The Valspar Corporation also had an approved closure plan and submitted a certification of closure to the IEPA. It was during the conduct of the closure inspection of the hazardous waste facility that the IEPA was alerted to the presence of other potentially hazardous materials. Documentation of these activities is presented in Appendix 3, which includes a copy of the facility permit application, closure plan and certification of closure.

3.0 METHODOLOGIES

3.1 Collection of Field Data

3.1.1 Physical Parameters

Maps of each building were prepared in order to facilitate identification of subsequent samples and the general layout of the plant. Similarly, photographs were made of certain areas. Identification of each tank by a Valspar and IEPA number, where possible, was recorded in a field log book. The Valspar number was the number stenciled on all stationary tanks. It is a number used by Valspar when the site was in operation. The IEPA number is a sequential system of numbers spray painted on the tanks by Goodwill as part of their inventory of the site. It is the number used by IEPA for the 7-3-85 inventory. In addition, a description of the contents and the size of the tank for quantification of the contents were recorded. Contents were also categorized with respect to the physical state (liquid, solid, semi-solid) and color.

3.1.2 Chemical Characteristics

In enclosed areas, Draeger tubes were utilized for field quantification of toluene, volatile hydrocarbons, benzene, alcohol, and humidity. Measurements of combustability (%LEL) and oxygen (%O_2) were made with a GasTech meter model 1214 in each tank to determine need for sampling and subsequent level of protection. Some of the residues were skinned over liquids. To determine if there were materials with LEL readings below the skins, all residues with a 0% LEL reading were taken from the newly exposed surface. The first reading was called the tank LEL. The second reading was called the surface LEL. Primarily, the sampling crew assumed Level D protection, but when an LEL of 2% or more was recorded, Level C protection was adopted and sampling proceeded. In no case was an LEL of 100% encountered in a situation enclosing the sampler. All samples were obtained without entering inside the tanks.

3.2 Collection of Samples

3.2.1 Basis for Sample Collection

Samples were taken of all liquids in underground tanks and production areas. Samples were also taken of solids with a lower explosive limit (LEL) over 2%. In the resin storage areas, representative samples were taken. Based upon LEL readings, color, physical state, and texture, many of the tanks contained the same materials. Because of the large number of tanks and the small volumes of residue in each tank, each residue was classified on the basis of the above parameters and each type of residue was sampled. Depending upon the number of tanks with similar materials, some types were sampled more than once. Approximately 20% of all tanks with residues were sampled.

3.2.2 Sampling Method

For liquid resin and production tanks, a clean paper cup was dipped into the container and emptied into 500 ml. jars prepared by PACE Laboratories. For underground tanks, a clean bottle of 1¼" diameter was secured each time by a new piece of string and lowered into the tank. Equal subsamples were taken from the top and the bottom of the liquid to ensure proper phase representation. These were collected in new, clean 1 pint or 1 quart glass jars. Solid resin samples were cut and placed into a sampling jar. Samples of peeling paint were collected from the floors and walls on floors 3, 4, and 5 in buildings 7, 8, and 12 and placed in sample jars. Samples were identified by EPA/Valspar number, date of collection and initials of the sample collector.

3.2.3 Sample Custody

Sample jars were labeled with sequentially numbered sample labels. The samples were sealed in plastic bags for shipment. Samples 1-29 were brought by James Kinsey to Minneapolis. Flash point tests were conducted and then James Kinsey transferred the samples to PACE Laboratory, Inc. for analysis. Samples 30 through 85 were transported to Minneapolis by truck. James Kinsey received the samples, conducted flash point tests, and then transferred them to PACE Laboratories, Inc. for analysis. Chain of Custody records for all the samples are found in Appendix 4.

3.3 Analytical Methods

3.3.1 Preliminary Analysis

A combustability test was made on each sample to facilitate flash point processing. A cotton swab with sample was placed in a flame and each sample was classified as follows:

Very combustable - ignite immediately
Combustable - burns when heated
Non-combustable - does not burn

Subsequently, flash points were obtained per procedures presented in Appendix 5.

3.3.2 PACE QA/QC

Samples were forwarded to PACE Laboratories, Inc. for analysis. The QA/QA program and analytical results submitted by PACE Laboratories, Inc. is presented in Appendix 6.

4.0 PRESENTATION AND ANALYSIS OF DATA

The data, collected in accordance with the methodologies described in the previous section, are presented in this section in a way that facilitates its use to achieve its overall purpose in the "response action." To that end the data is presented to serve two functional purposes: first, to provide information that identifies and categorizes any hazardous materials, and secondly, to provide the information required to determine costs and procedures for removal of any hazardous materials (physical state, quantity, hazard classification, etc.).

Table 4-1 presents the field and laboratory data used to identify the hazardous properties of materials on the site. This table has been divided into three subcategories (Tables 4-1A, 4-1B and 4-1C) to correspond with the three major areas of the site considered by this study. These three areas are:

- Process areas
- Resin storage area
- Underground tank area

The field and laboratory data summarized in Table 4-1 shows that all containers at the site have been evaluated, and that appropriate analysis has been performed on those containers which contain residues, to identify any hazardous properties.

The data presented in Table 4-2 provides additional information on the content of containers as it relates to the quantity, location and physical state of residue materials. The data presented in Table 4-2 is accompanied by a series of room-by-room descriptions and color coded maps which locate containers with hazardous materials. The general reference, four different maps of the site (plot plans and a legal description map) are found in Appendix 7. These large scale maps of the site are supplemented by the small scale drawings presented with the room-by-room descriptions and show the layout of the tanks and location of tanks containing hazardous residues. The small scale drawings are color coded to indicate the presence of hazardous materials as follows:

orange = hazardous liquid
yellow = hazardous solid

4.1 Production Area

A summary of all residue remaining in production area tanks is presented. A total of 23 tanks containing 329 gallons of residue have been determined to be hazardous. The location of these tanks can be found in the 11 small scale room drawings of the production areas. A room-by-room description of these drawings is presented below:

4.1.1 Seventh Floor, Buildings 7 and 8

These rooms were used to store knocked down cardboard and to dry drums. The rooms are clean and empty. There is one piece of equipment in Building 8 that appears to be part of a small filter press. There are no wastes on this level, no peeling paint, and no pipes.

4.1.2 Sixth Floor, Buildings 7, 8, and 12

The sixth floor rooms in Buildings 7 and 8 were both used for storage of pigments. These rooms are empty. The sixth floor of Building 12 was the label department and is an office area with label storage space. The roof on Building 12 has a leak and a 250 gallon portable vat had been placed below the leak to catch the rain water. This vat is labeled 076 and on July 3, 1985 the IEPA inventory listed it as full. On August 5, 1985 during a preinvestigation site visit, the vat drain was open and the vat was found empty. Len Rota, an engineer from Valspar, stated the vat had been placed there the year before to catch rain water.

EPA data for the sample they took was pH=6 and flash point greater than 210°F. This is consistent with rain water. There were no discolorations or solid residues on the floor to indicate that oils or pigments had been dumped. There was some peeling paint which was composited with similar peeling paint samples from other floors. The peeling paint was not EP toxic and therefore not hazardous. The only pipes on the sixth floor were for the sprinkler system.

4.1.3 Fifth Floor, Buildings 7, 8, and 12

The fifth floor was the first of three floors used for paint manufacturing. Liquid raw materials were pumped up to this floor and weighed into portable vats. Building 8 was where the pigments were mixed. In Building 7 resins and solvents were added to the pigments and the resulting slurry was poured into one of the pebble, sand, or roller mills on the fourth floor of Building 7. Building 12 was also used to measure bulk liquids into portable vats. The materials were then drained into mixing tanks on the third floor.

The function of Tanks 69 through 74 is not known. Valspar did not use those tanks and they were all empty. Tank number 075 was a portable vat placed on a scale beneath the openings of many pipes which converged at that location. All the valves were open and one of them had drained no more than 2 gallons of resin which had covered only half of the tank bottom. The IEPA samples taken 7-3-85 showed the material to be ignitable. Our sample (#1) taken 8-12-85 showed that parts of the material were ignitable. Due to the small amount of leakage, it is reasonable to assume that ignitible solvents in the resin have evaporated and that the flash point of the resin varies with the subsample, i.e., the skin having a higher flash than the liquid. We recommend that this tank be scraped clean and steam cleaned to remove all hazardous residue.

All pipes were open and, according to Valspar personnel, their contents were drained back to the storage tanks. In Building 12, there were two valves that were closed. We opened them and drained a gallon of solvent from one and less than a pint from the other.

Some of the paint on the walls was peeling off. It was sampled and composited with similar peeling paint from the other floors. The material is not hazardous.

4.1.4 Fourth Floor, Buildings 7, 8, and 12

The fourth floor was the middle floor of the three floors used for paint manufacturing. The caustic sludge tank in Building 12 was the only tank on this floor. There is a laboratory and a tinting area in Building 8. Building 7 has three mills where pigment slurries were ground and dispersed. Building 12 has a bulk liquid dispensing area and a caustic cleaning system. Bulk liquids were weighed into portable vats and along with the ground pigments they are drained into mixing tanks on the third floor for mixing, tinting, and thinning.

Residues from the caustic cleaning system were collected in Tank 068. The tank contained eight inches of caustic sludges. This material was sampled by both the IEPA on 7-3-85 and Waste Reduction on 8-23-85. Both IEPA data and PACE data (sample #77) showed that the sludge was not ignitable or corrosive. PACE data also showed that the material was not EP toxic. Other caustic sludge samples and caustic waste water samples taken from tanks in other areas were also non-hazardous. This is consistent with Valspar's claim that its caustic sludge waste was non-hazardous (see Appendix 2).

There were many pipes along the ceiling in Buildings 7 and 12 servicing the bulk filling areas. All valves were open and, according to Valspar personnel, their contents were drained back to the bulk storage tanks.

The paint on the walls and ceiling was peeling. Samples were taken and composited with similar samples from the other floors. The peeling paint is not hazardous.

4.1.5 Third Floor, Building 7

Most of the tanks in this area were used to mix, tint, and thin paint prior to filling. Tanks 041 and 042 are an exception. They were used to mix liquid organic wastes for disposal in an industrial fabricated fuel program. There are 20 tanks and a 10 gallon pressurized glue pot in this area. Fifteen of the tanks are empty by our count while 18 of the tanks were empty according to the IEPA inventory. The difference is in Tanks 048 and 049, which each have ¼" of soft solid residue, and Tank 030 which had 35 gallons of water.

The residues in Tanks 041 and 042 are both ignitable and EP toxic. We recommend that these tanks be steam cleaned to assure the complete removal of residue.

The residue in Tank 048 was a soft solid with a total solids (103°C) of 59%. The bottom drain was open and none of the residues had flowed from the tank. The LEL reading of 15% showed that the residue was emitting hydrocarbon vapors. The solid residue had a flash point of 125°F. Although flash points are not used to determine if solids are ignitable waste and although this residue is not spontaneously combustible, the presence of vapors make the residue easy to ignite and if enough residue were present it could be a fire hazard. Therefore, we recommend that the residue be removed. Steam cleaning of this tank is not recommended because combustibility is the only hazard and, without sufficient mass to sustain a fire, the remaining film could not be a hazard.

Tank 049 has ½" of soft solids. It is open at the top and at the bottom drain. The LEL reading is 0% indicating no solvents. None of the solid residues sampled were EP toxic. The only EP toxic materials found on-site were liquids and this tank contained no liquids. Therefore, the residue is classified as non-hazardous.

The contents of the 10 gallon glue pot are non-hazardous. The high LEL reading, foul odor, low pH and low O_2 are due to the biological decomposition of the glue. There was no flash because there were no solvents. Most of the material was water. There were no colors indicating heavy metal pigments and, because glues generally don't contain heavy metals, it was assumed that it was not EP toxic.

Tank 030 has about 35 gallons of water in a trough along the inside edge. The trough is two inches deep and 16 inches wide. The tank was open at the top and the LEL at the water surface was 0%, indicating that if there had been any solvents in the tank that they have dissipated. The pH was 10, indicating that the water was once a caustic solution or rinse water from the caustic cleaning of the tank. The water is not ignitible and therefore is not a hazardous waste.

There were no bulk liquid filling areas on the third floor and most of the pipes were either water or steam pipes or pipes going up to the fourth and fifth floor filling areas. Most of the drain pipes from the tanks were removed. The remaining drain pipes were open.

4.1.6 Third Floor, Building 8

Most of the tanks in this area were used to mix, tint and thin paint prior to filling. Tanks 063 through 067 are exceptions. Tanks 063 through 066 were used to store wash up solvents. The use of tank 067 is unknown. Valspar personnel say they have never used it. There are 18 tanks in this area, 10 of which were empty by our count, while 17 were empty according to the IEPA inventory. The difference is with Tanks 051 through 056 and 059 which were not drained. The amounts in each tank varied from a couple ounces to several gallons. A total of five gallons of liquids were drained from these seven tanks with most of the liquids coming from Tanks 052 and 059.

The residues in Tanks 051 through 056 and 059 were combined into a single five gallon pail, mixed, and sampled. The results show that the residue is both ignitable and EP toxic for Barium (D005). We recommend that the paint and paint skins remaining in these seven tanks be removed and that the tanks be steam cleaned to assure complete removal of all hazardous residues.

Tank 067 was 1/3 full of clear water. The LEL inside the tank was 0% and the flash point was greater than 210°F. The liquid was non-combustible, boiled at about 210°F and has a pH of 9. Analysis for metals showed that the contents were not EP toxic. The contents of this tank are non-hazardous. The pH indicates that at one time this was caustic solution used to clean the tank.

The drain pipes for these tanks were either removed or open.

4.1.7 Third Floor, Building 12

Most of the tanks in this area were used to mix, tint, and thin paint prior to filling. The only exceptions are a 30 gallon tank that is part of the caustic cleaning system, and Tank 29 whose use is unknown. Tank 29 was not used by Valspar. Of the 24 tanks in this area, 22 are listed as empty by this inventory while all were empty according to the IEPA inventory. The differences are Tank 013 and the 30 gallon caustic system tank. The IEPA did not inventory the 30 gallon tank nor the Tank 29.

Tank 013 contains 420 gallons of clear water. The water sample was non-combustible with a LEL at the surface of 0% and a flash point greater than 210°F. Metals were at or below detection limits and the pH was neutral, indicating that the material was clean water.

The 30 gallon caustic system tank was full with half sludge and half water. The pH of the water was 11. The sample from this tank was composited with a sample from Tank 030 which was a similar material. The composite was analyzed for metals. Barium, chromium and lead were found at low levels. Even if all of these metals were extracted in the extraction procedure, the resulting concentrations would have been below the EP toxicity concentrations. The LEL reading at the surface was 0% and the flash point was greater than 200°F. This residue is not a hazardous waste.

There were no bulk filling areas in this area. Most of the pipes were water and steam pipes. The tank drain pipes were either removed or open.

4.1.8 Second Floor, Building 10

The second floor of Building 10 was a finished goods warehouse. There are two tanks and an electrical vault in the room. The prior use of this equipment is unknown. Both this survey and the IEPA survey found these tanks empty. The vault was not inventoried by the IEPA but because of the possibility that the estimated 400 gallons of clear yellow oil within the vault could contain PCBs, the oil was sampled and analyzed. No PCBs were detected in the oil.

The only pipes in this area were for the sprinkler system.

4.1.9 First Floor, Building 10

The first floor of Building 10 was a finished goods warehouse. There are nine tanks in this area. Tanks 001 and 002 were empty and their prior use is unknown. Tanks 003 and 004 were used to store returned paint prior to reformulation. Tanks CT1, CT2, and CT3 (Waste Reduction identification numbers) were used to neutralize caustic waste waters from the cleaning of tanks on the third and fourth floors. The two empty 30 gallon tanks held or mixed acids that were used to neutralize the caustic waste water. The IEPA did not inventory the five tanks in the caustic system. The four remaining tanks were listed as empty by the IEPA while only two tanks were listed as empty by this inventory.

Tanks 003 and 004 contain one and two feet, respectively, of liquids with solids at the bottom. The clean out manholes at the bottom were still bolted in place. We could gain access to 003 from the top but not 004. Both tanks were connected at the bottom by a common pipe with a series of closed valves. A sample collected from this pipe was similar in color and physical state to a sample collected from 003 from the top. The samples were combined and submitted for analysis as representative of both tanks. The pH was 10, the LEL reading was 0%, and the flash point was greater than 210°F. This is indicative of a caustic wash water suggesting that the residue is the result of an attempt to clean the tanks. The metals that were present were too low to make the material EP toxic. Therefore, the residues are non-hazardous.

Tanks CT1, CT1, and CT3 were all used to neutralize caustic waste waters and they all had residues. CT1 had a solid residue and CT2 and CT3 were almost full of water. CT1 was not sampled because its residue was similar to several other residues (i.e, 078, 090, and peeling paint) which had been sampled. Like the other solids with LEL=0%, this residue is non-hazardous. CT2 and CT3 both had pH of 10 and LEL of 0%, indicating that they contained noncorrosive caustic waste waters. The flash points were greater than 210°F showing they were not ignitible waste. The samples were combined and analysis for metals showed only detection limit or lower levels, therefore they were not EP toxic. The contents of these tanks are non-hazardous.

The pipes from the tanks in the caustic system were filled with caustic waste waters. The pipes from the acid mixing tanks were either removed or empty. The other pipes in the area were for the sprinkling system.

4.1.10 First Floor, Building 11 and Building 13

The first floor of Building 11 was the shipping and receiving area. There is only one tank in this area. It is labeled as a "sludge cube" and was used to store bulk titanium dioxide slurry. The IEPA survey listed this tank as half full. The construction of the tank is deceptive because the tank bottom is almost four feet from the floor. The tank contains no more than six inches of residue. The LEL reading was 0%, the flash point was greater than 210°F and the pH was 8. The residue is neither corrosive nor ignitible. Except for lead and arsenic the metals were at or below detection limits. Even if all the lead and arsenic are extracted during the extraction procedure, the EP toxic limits would not be exceeded. Therefore, the residue is non-hazardous.

The first floor of Building 13 was used for storage and has 12 portable vats that were not included in the IEPA survey. Some of the vats have a solid resin residues of less than one inch. The LEL reading within the tank are 0% but at a freshly cut surface they are 4%. These residues are combustible and have a flash point of 139°F. Like similar residues in other areas of this site, these solids are not ignitable wastes because they do not ignite through friction, absorption of moisture or spontaneous chemical changes. Yet they will ignite and burn and if in sufficient amounts they can be a fire hazard. Therefore, we recommend that these residues be scraped out and disposed. Steam cleaning of these tanks afterwards is not needed.

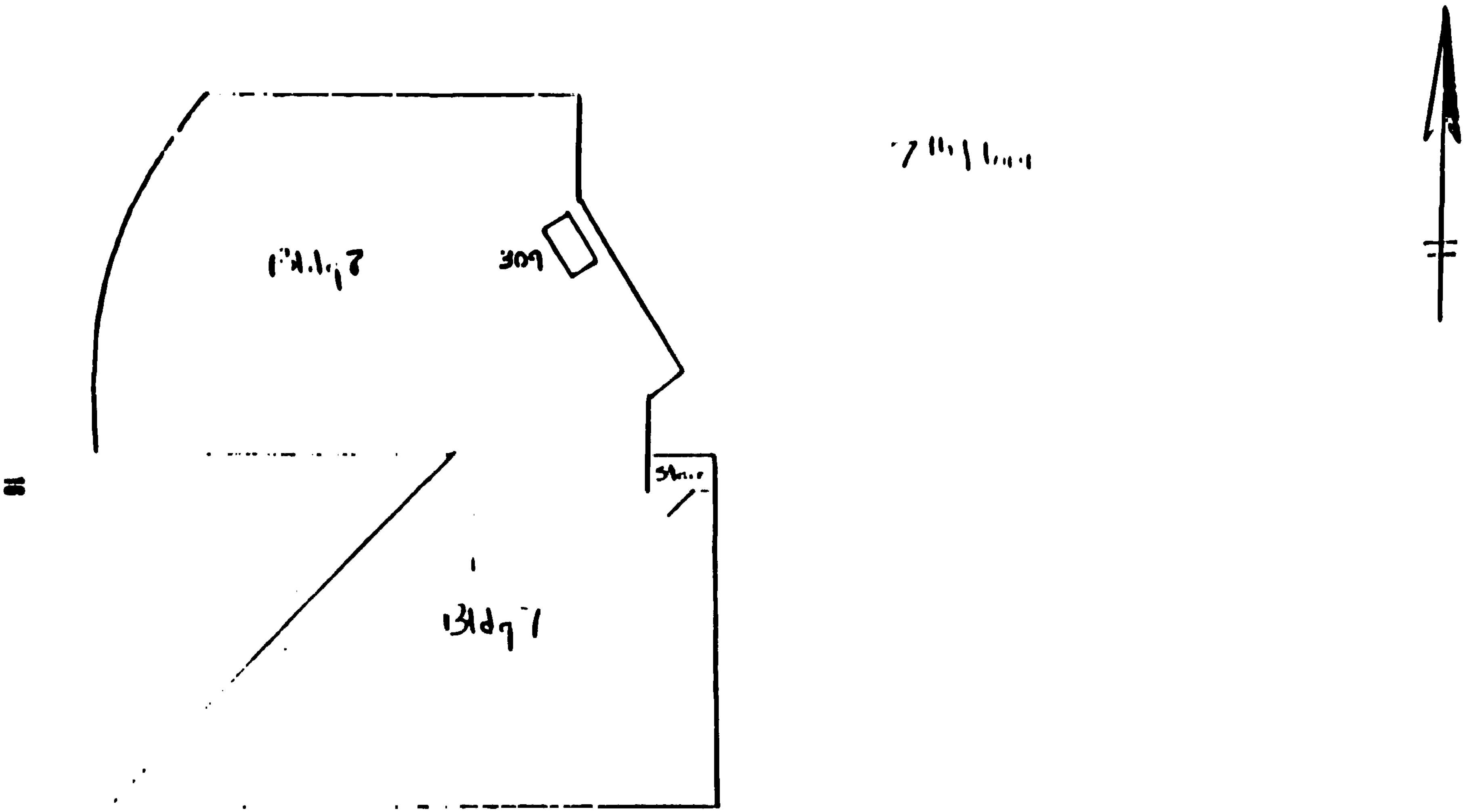
The only pipes in these areas are steam, water, and sewage pipes.

4.1.11 Basement, Building 12

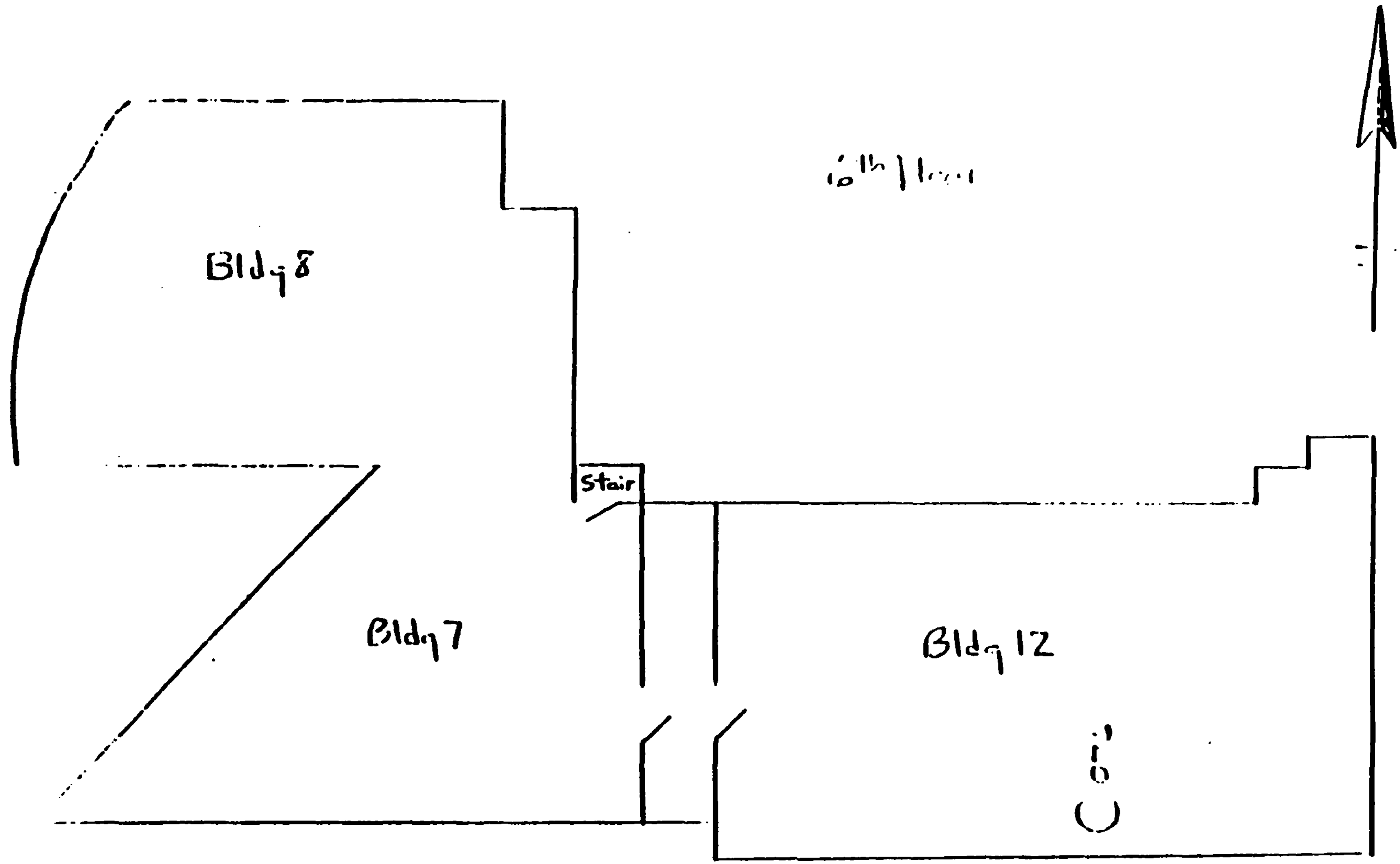
This area is used for storage. It contains three tanks and a partial barrel of acid. Ownership of the acid is claimed by Mike McRath of Social Welfare Management Consultants. The three tanks are settling tanks where neutralized caustic waste water from the tanks in Building 10 is collected. The neutral water was sewered and the settled sludges were pumped out and landfilled (see analysis, supplemental permit, and disposal contract in Appendix 2). The IEPA listed Tanks 077 and 079 as empty. Only Tank 077 was listed as empty in this inventory.

Tank 078 contains two feet of liquids and sludge. The pH was a neutral 7 showing that the residue is not corrosive. The LEL was 0% and the flash point was greater than 210°F showing that it is not ignitible. All metals were at or below detection limits showing that it is not EP toxic. The residue is non-hazardous.

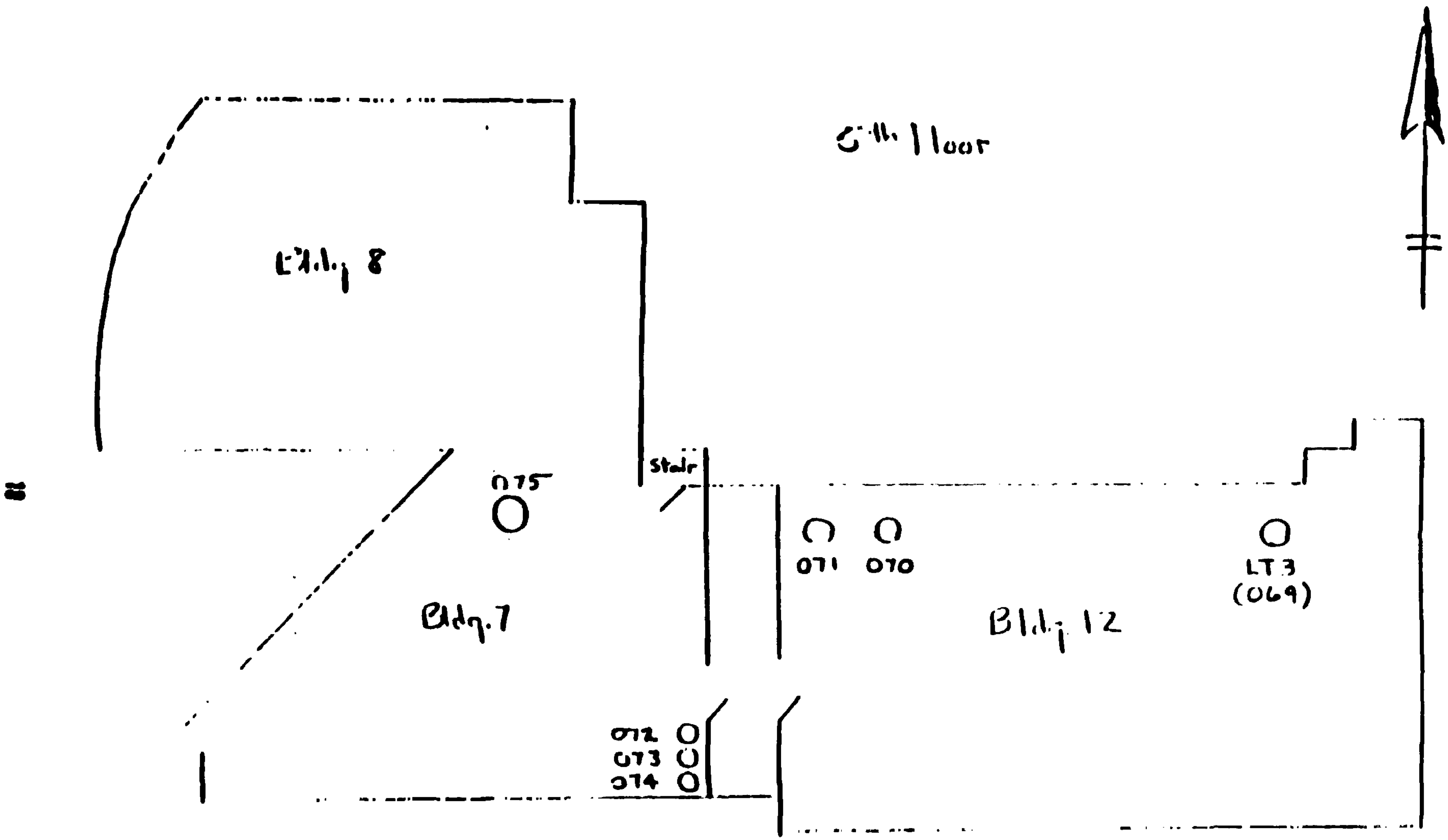
Tank 079 contained five inches of solid sludge. All three tanks were used to settle the same waste stream and because both the PACE Laboratory analysis of Tank 078 and Valspar's analysis of the caustic sludge waste stream show that this waste is non-hazardous, we assume the waste in Tank 079 is also non-hazardous.



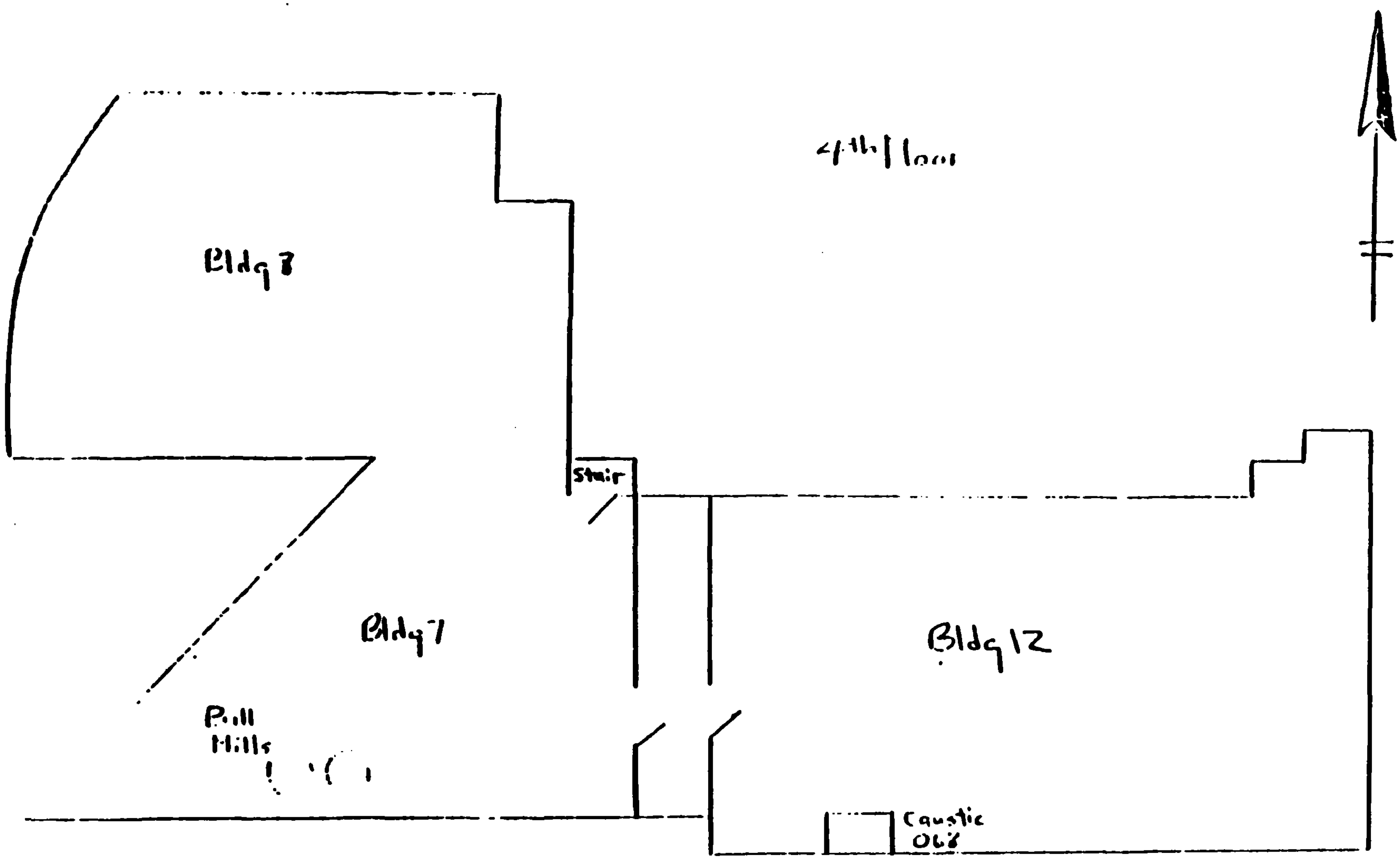
Drawing 1
Production Area



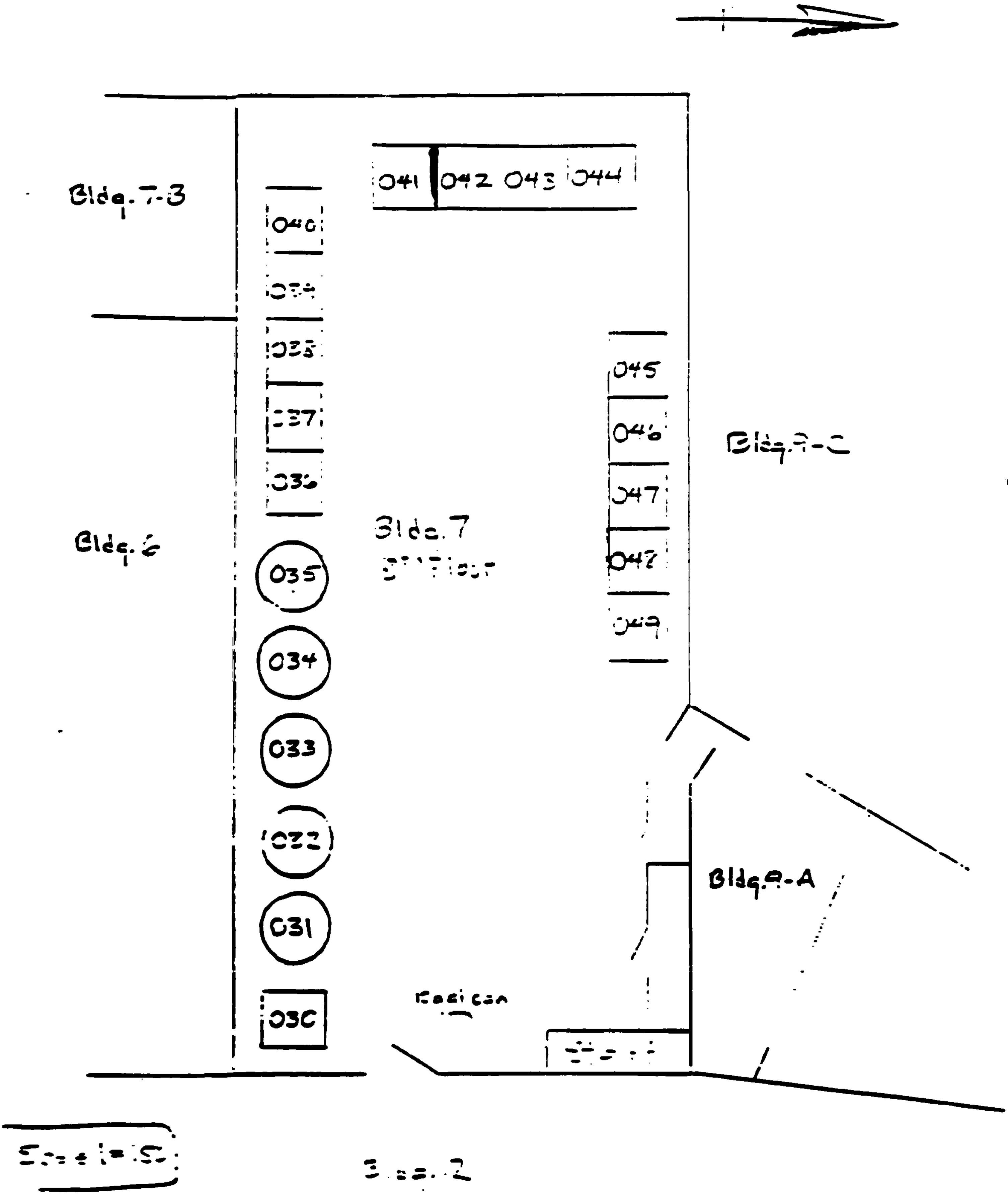
Drawing 2
Production Area



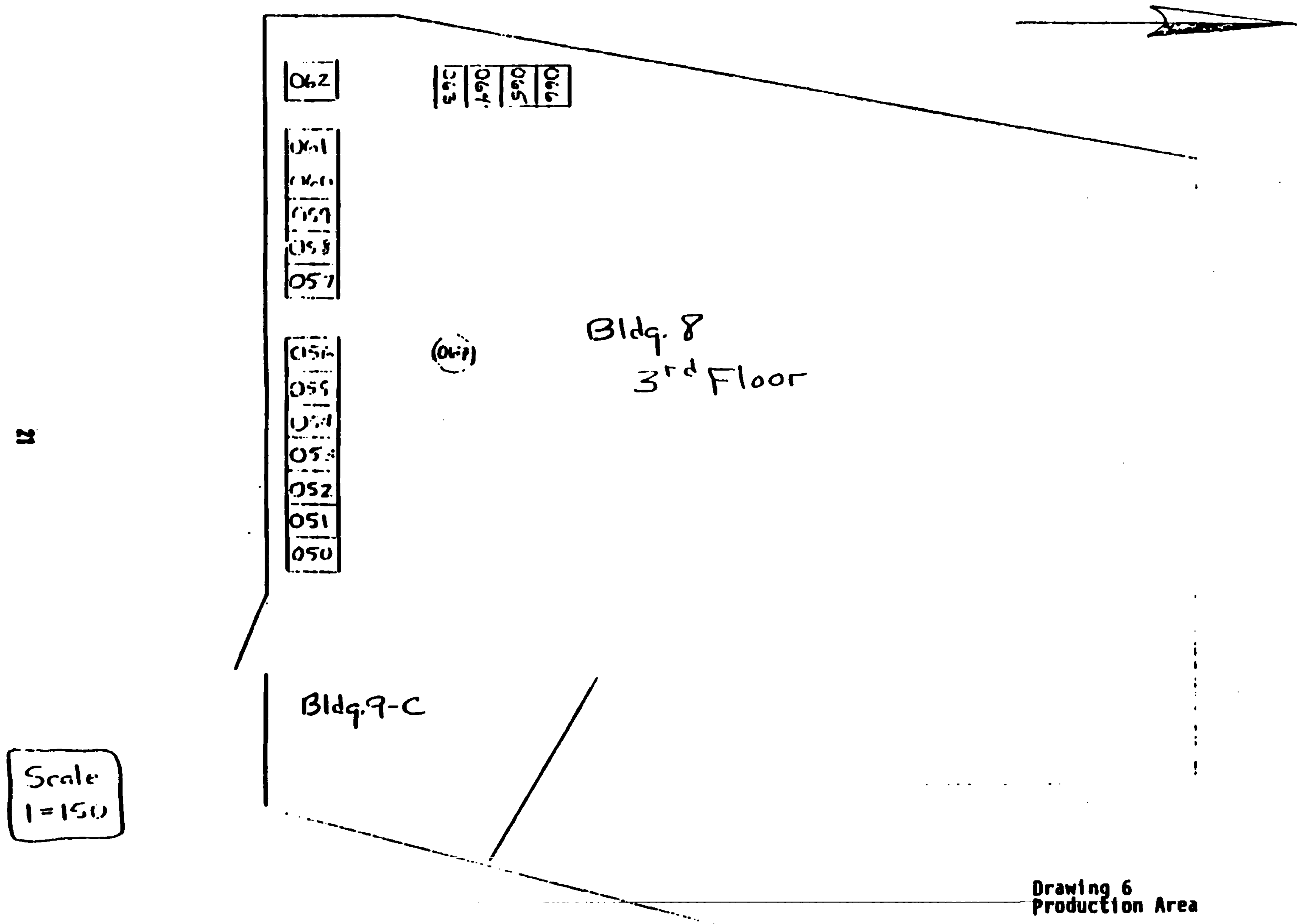
Drawing 3
Production Area



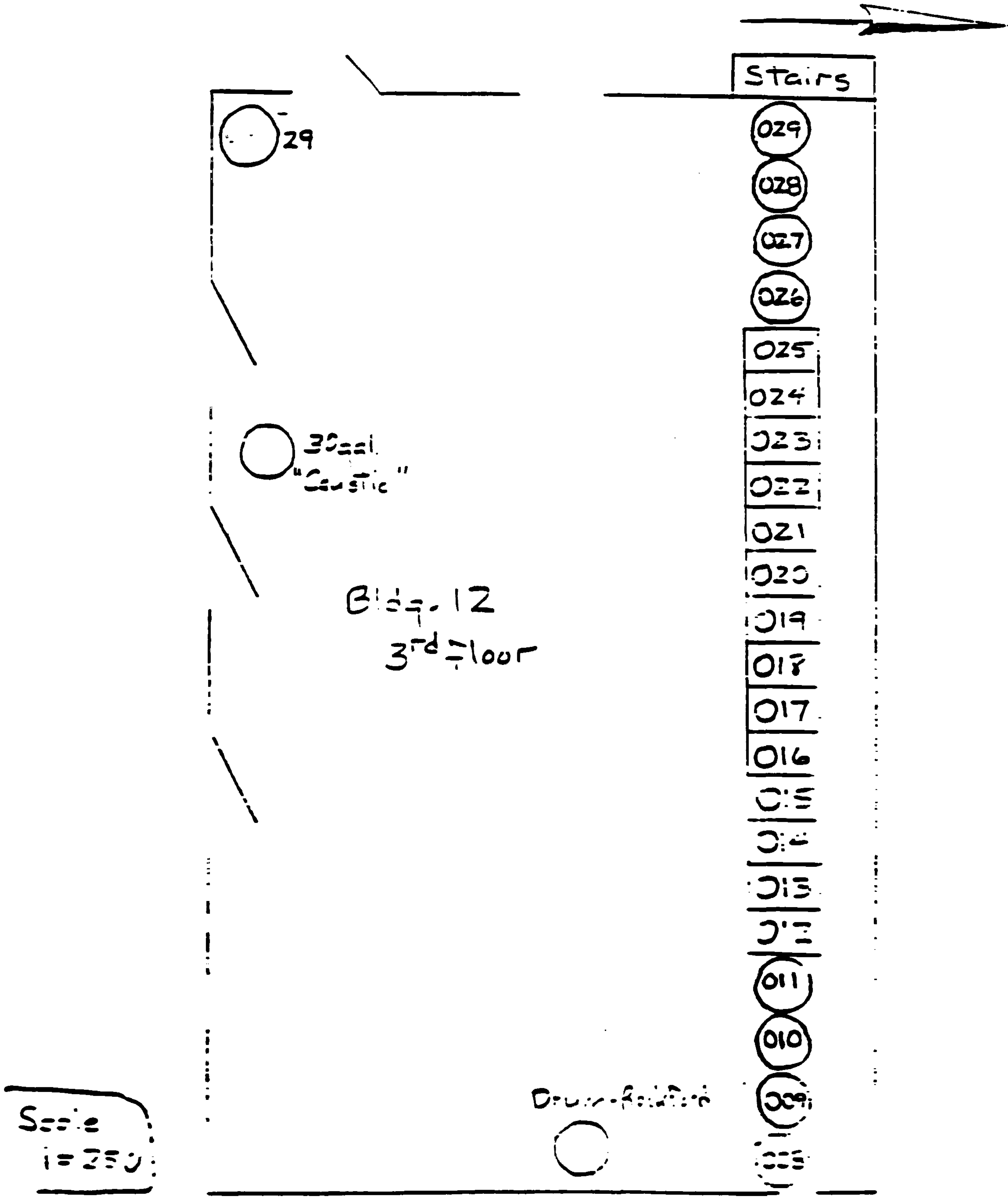
Drawing 4
Production Area



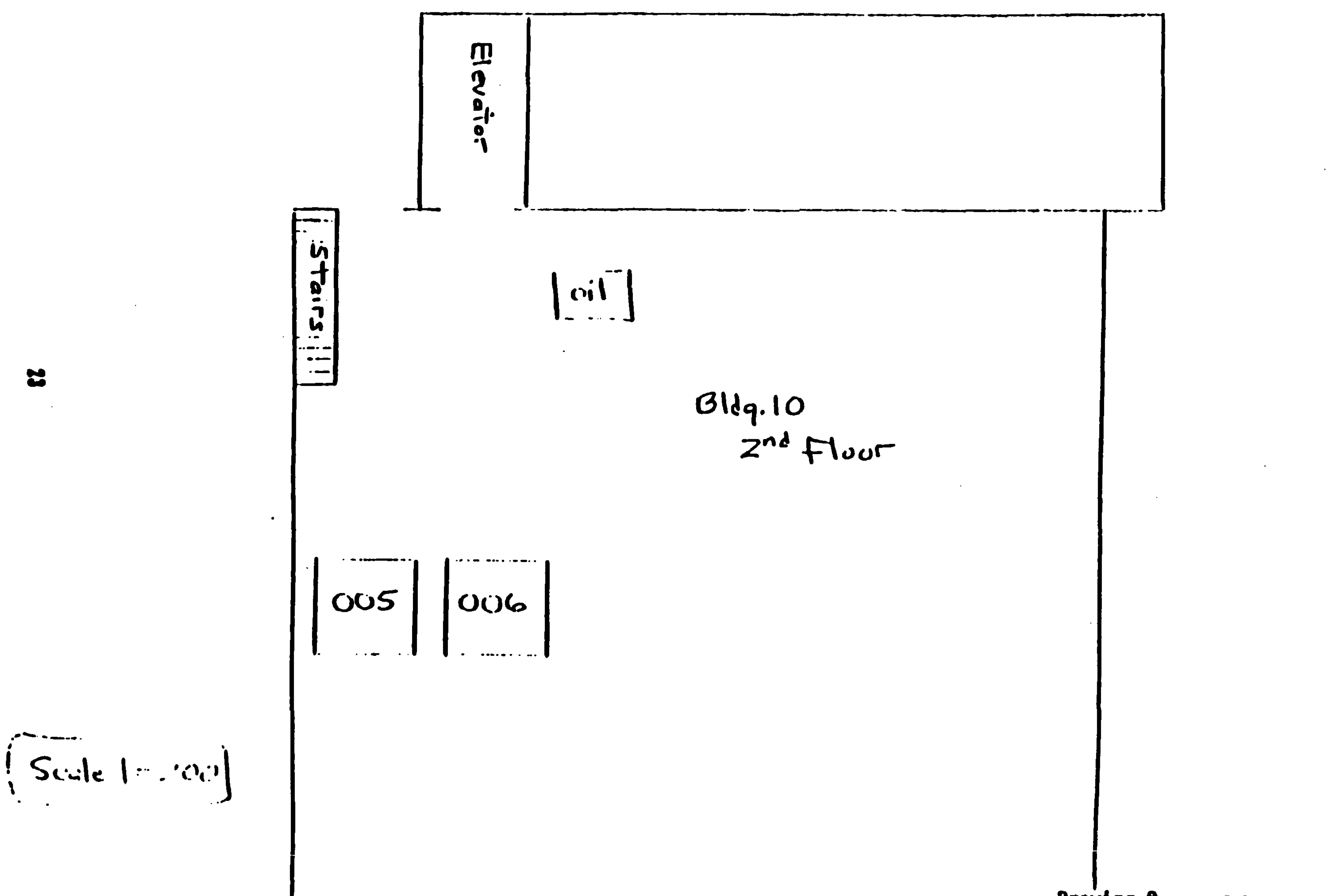
Drawing 5
Production Area



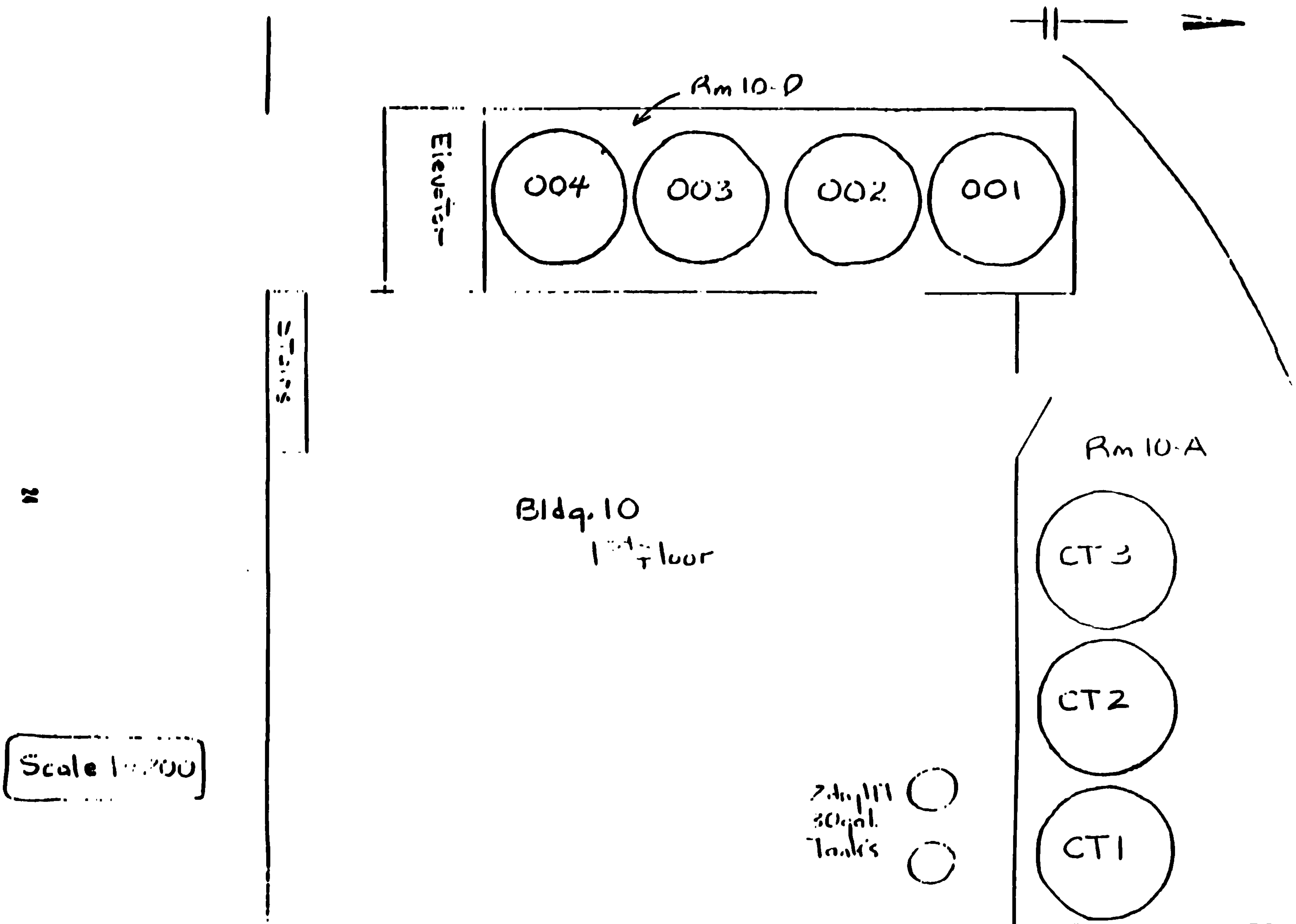
Drawing 6
Production Area



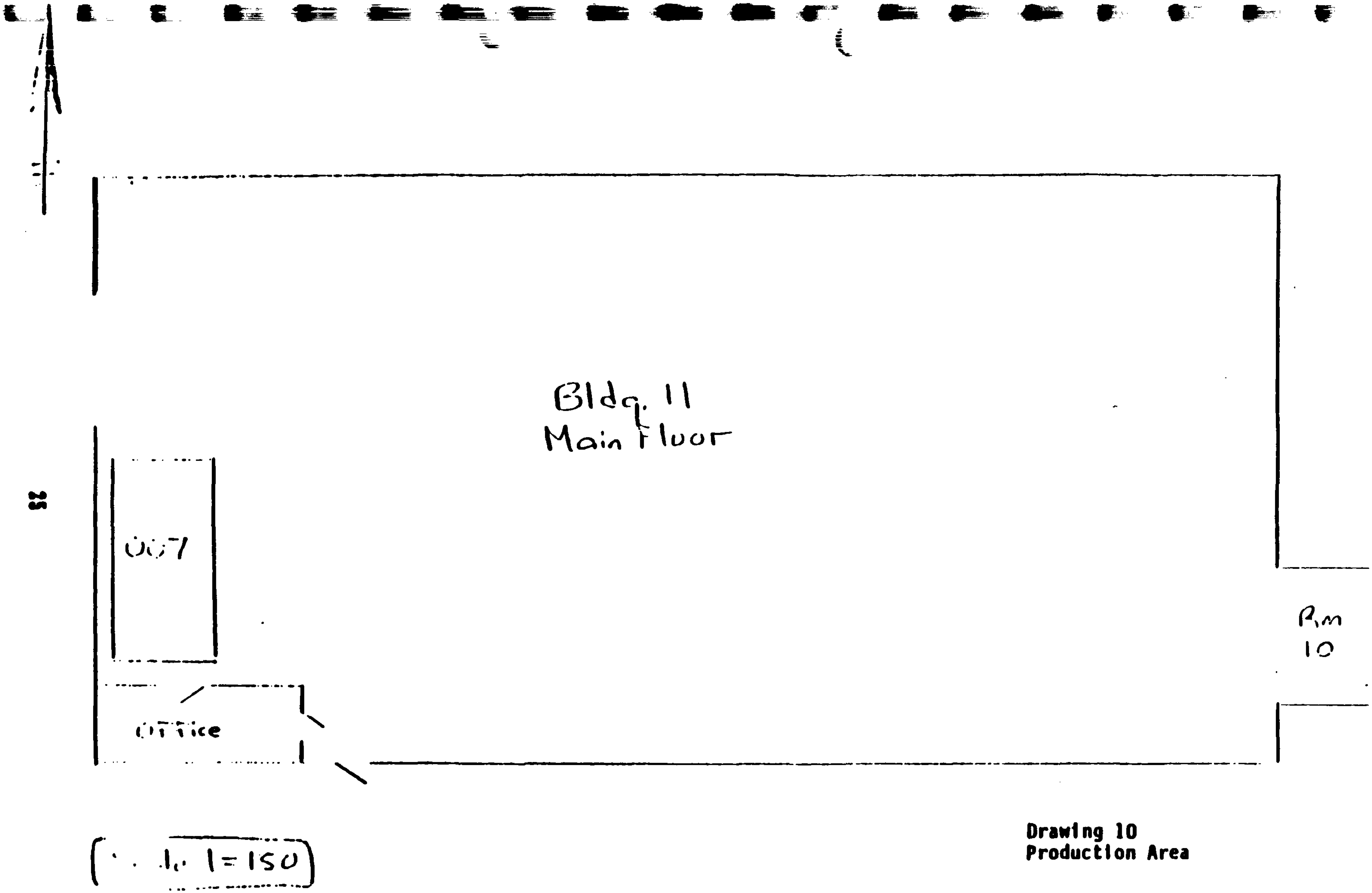
Drawing 7
Production Area



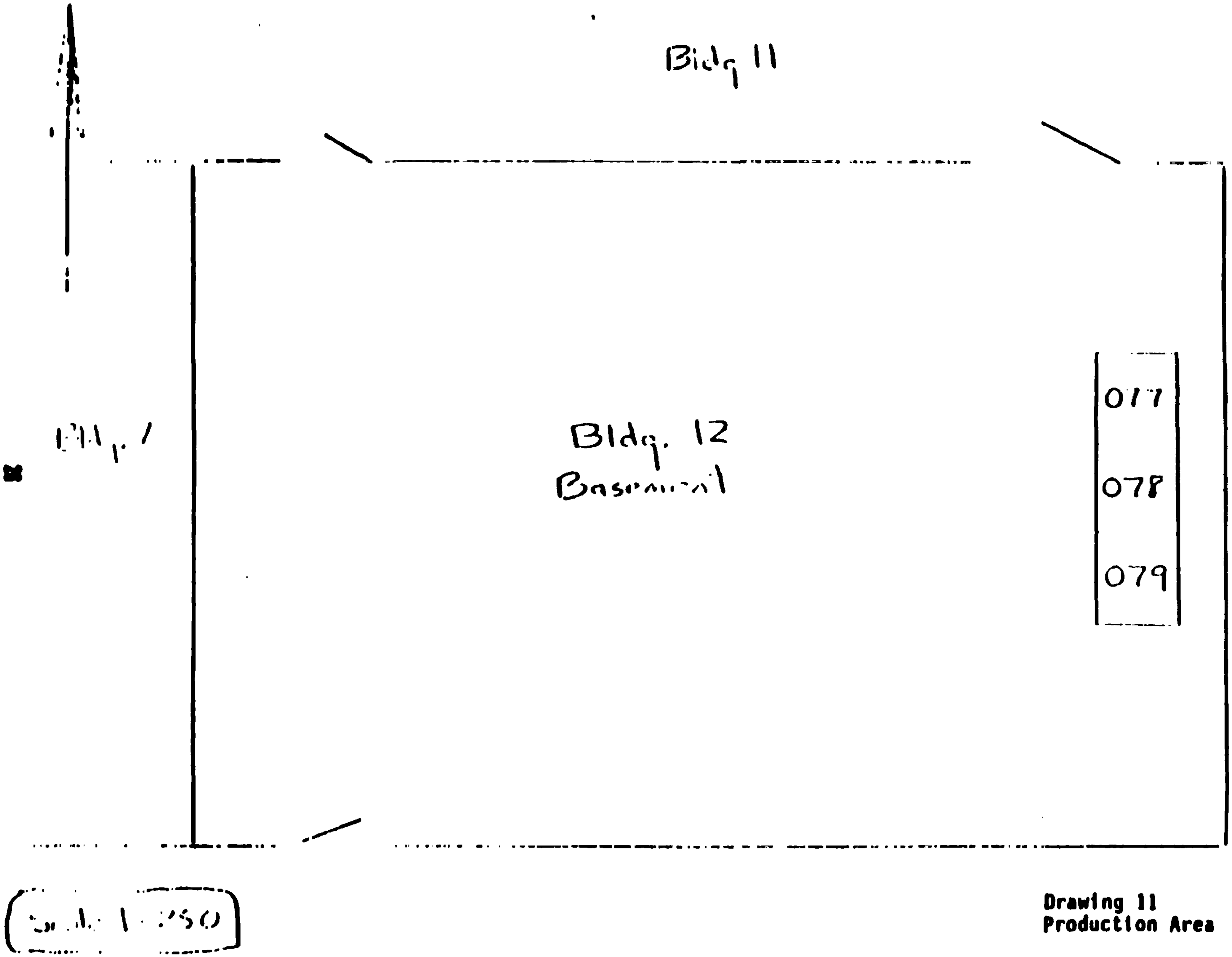
Drawing 8
Production Area



Drawing 9
Production Area



Drawing 10
Production Area



Drawing 11
Production Area

4.2 Resin Storage Area

Each resin storage tank was checked for LEL and O_2. All residues were cut into and another LEL reading was taken at the new surface to determine if combustible vapors were emitted. Of the 170 resin storage tanks, 114 had residues and 21 residue samples (18%) were selected for flash points and analysis for metals. Seven of the 21 samples were of residues that did not emit measurable combustible gases at the newly exposed surfaces. These samples had LEL readings of 0% or 2% and their flash points were all above 200°F. The other 14 samples had LEL readings 5% or above and their flash points were below 132°F. Generally, the higher the %LEL, the lower the flash point. Since most of the residues could be classified into a few small groups by physical state, color, opacity and %LEL, the objective of the sampling became to select representatives of these groups and to classify all the members of the grouping according to the hazards of the chosen representatives. Since none of the samples taken were EP toxic or corrosive, the only hazardous characteristics of concern became ignitibility. Based upon the correlation between the %LEL of the resins and their flash point, any resin with a surface LEL of 3% or greater was classified as ignitible.

A summary of residues remaining in resin storage area tanks is provided in Table 4-4. A total of 3,100 gallons of hazardous materials was identified. The location of the tanks containing these residues is shown in a series of eight small scale room drawings of resin storage areas. A room-by-room analysis and discussion follows.

4.2.1 South half, Building 6

The south half of Building 6 was used for bulk storage of oils and resins. There are 64 tanks arranged in five banks. The front, back, and middle banks are elevated so that the bottoms of the tanks constitute the ceiling of the room. The side two banks rest at ground level and generally extend as high as the top of the elevated banks. All of the tanks have an upper manhole on top and a clean out manhole within one inch of the bottom on the front side. All manholes were open. Of the 64 tanks, 26 are empty, four contain liquid residues, 16 contain solids and 18 have skinned over liquids.

In the south half of Building 6, there were six tanks containing liquid resins with LEL readings of 3% or more. Tanks 118, 122, 123, 124, 128, 129, and 195 are all classified as ignitible waste. Flash points for 124, 129, and 195 confirm that they have flash points below 140°F. Thirteen of the solids also had LEL readings of 3% or more. However, flash points are not used to classify solids and because these solids are not ignited through friction, absorption of moisture or spontaneous chemical changes, they are not ignitible wastes. These residues do burn and in a sufficient quantity they could pose a fire hazard. To eliminate this hazard we recommend that these residues be removed. Steam cleaning of these tanks afterwards is not needed. The tanks with combustible solids are 101, 108, 114, 115, 116, 117, 121, 125, 126, 127, 170, 171, and 169. The remaining tanks contain non-hazardous residues.

The pipes that attach to the tanks containing the hazardous residues may be filled with hazardous residues. Unless they can be shown to be open by blowing air through them, we recommend that these pipes be dismantled so that the hazardous residues can either be removed or so that the pipes can be disposed of as hazardous waste. If the residues are removed, the pipes can be steam cleaned instead of disposed of.

4.2.2 North half, Building 6

The north half of Building 6 was used for bulk storage of oils and resins. There are 39 tanks arranged in five banks. The front, back, and middle banks are elevated so that the bottom of the tanks constitute the roof of the room. The side two banks rest at ground level and generally extend as high as the elevated banks. All of the tanks have an upper manhole on top and a clean out manhole within one inch of the bottom on the front side. The top manholes are open and, except for Tanks 176 through 183, the clean out manholes are removed. Of the 39 tanks, three are empty, one contains a liquid residue, 26 contain solid residues, and nine contain skinned over liquids.

These tanks were evaluated in the same manner as the south side tanks. Tanks 139, 153, 177, and 178 contain ignitible liquids. Tanks 137, 138, 140, 141, 143, 146, 147, 148, 150, 151, 154, 155, 156, 157, 158, 172, 182, and 184 contain combustible solids. The remaining 13 tanks with residues have non-hazardous residues.

We recommend that the pipes from the tanks containing hazardous residues be tested or cleaned in the same manner as for the south half of Building 6.

4.2.3 Building 6A (and 7-8)

The use of Building 6A and the three tanks within is unknown. Both the IEPA inventory and this inventory listed Tank 039 as empty and Tanks 091 and 092 as containing clear liquids. Tank 092 is full and it is located directly below ole in the roof. While it was raining, water was observed pouring into the tank and also dripping along the ceiling into Tank 091 which was half full. Data by both IEPA and PACE is consistent with the conclusion that the contents of both tanks is rain water. Metals analysis showed that metals were present at or below their detection limits; therefore, the water is not EP toxic.

Building 7B was called the cooper shop, but its more recent use is unknown. There is only one tank in this room and it is a casutic cleaning tank. This tank is Tank 090 and it contains a sludge residue. The sludge is not ignitible and not EP toxic. The pH of the sludge is less than 12.5 and therefore the sludge is not corrosive. Like the caustic sludges in the production area, this one is also non-hazardous.

4.2.4 Building 3 and 3B

Buildings 3 and 3B were used to store oils at a time when roofing products were made by a former company which owned the site. According to Valspar personnel, the tanks were empty when Valspar leased the property and have not been used since. There are 29 tanks in these two rooms and all were listed as empty in the IEPA survey. There are residues that have spilled onto the floor of Building 3B and the tanks 216 through 234 have residues.

Tank 216 contains less than two gallons of thick black liquid resin. The LEL reading was 0% and the residue is classified as non-hazardous.

Tanks 217 through 234 have manholes within six inches of the bottoms. With heavy rains the roof leaks and the water fills up the room past the manholes, filling the tank bottoms and allowing floating debris to enter and leave the tanks. Several grab samples of water and debris were taken and composited for analysis. The results showed the material to be non-hazardous.

4.2.5 Buildings 15, 15A, and 15B

Building 15 was used to cook resin and has been abandoned for many years. Building 15A has no tanks and most of the pipes have been removed. Valves on the few remaining pipes are open. Building 15B is used to store latex. There are five tanks but only Tanks 238 and 239 were used by Valspar. All five tanks were listed as empty on the IEPA inventory. The five kettles and one tank in Building 15 were not included on the IEPA inventory. Of the eleven tanks, three were listed in this inventory as having residue.

On the floor in Building 15 was a sticky thick white liquid several inches deep. The LEL reading was 0% and the flash point was greater than 210°F. At that temperature the liquid boiled, leaving a solid latex residue. Analysis showed metals present at or below detection limits. This residue is non-hazardous.

Tanks 238 and 238 contained five inches of latex. Tank 238 was sampled and tested for flash point. The residues are not ignitible and are not corrosive. Metals were not analyzed for in this sample because they were analyzed for in another latex sample (Building 15 floor, sample #76). The other latex sample was not EP toxic, therefore this one would not be EP toxic either. These residues are non-hazardous.

Tank 237 contains a brown oil with a flash point greater than 210°F and metals at or below their detection limit. This residue is non-hazardous.

4.2.6 Building 5A

Building 5A was used to store resins. There are eleven tanks in this room, eight are empty and none were included in the IEPA inventory. According to Valspar personnel, these tanks have not been used since Valspar came on to the site.

Tanks 205 and 206 (Valspar numbers) contain less than 6 gallons of oils and resins. The LEL readings were 0% so they were classified as non-hazardous using the format developed for resin tanks in Building 6.

The thick black liquid in Tank 64 had an LEL of 27% when mixed. The flash point was 106°F and therefore it is classified as ignitible.

4.2.7 Building 5B

Building 5B was used for resin storage. There are four tanks in the room and all four have residues. These tanks were not included in the IEPA inventory.

Tank 124 has one gallon of a thick yellow liquid resin with an LEL of 3%. It is classified as ignitible.

Tanks 121 and 122 have solids with an LEL of 0 and are classified as non-hazardous using the format developed for resins in Building 6.

Tank 123 contains 10 inches of water. The source of the water appears to be a small leak in the roof. The LEL was 0% and the metals were near or below their detection limits. The residue is non-hazardous.

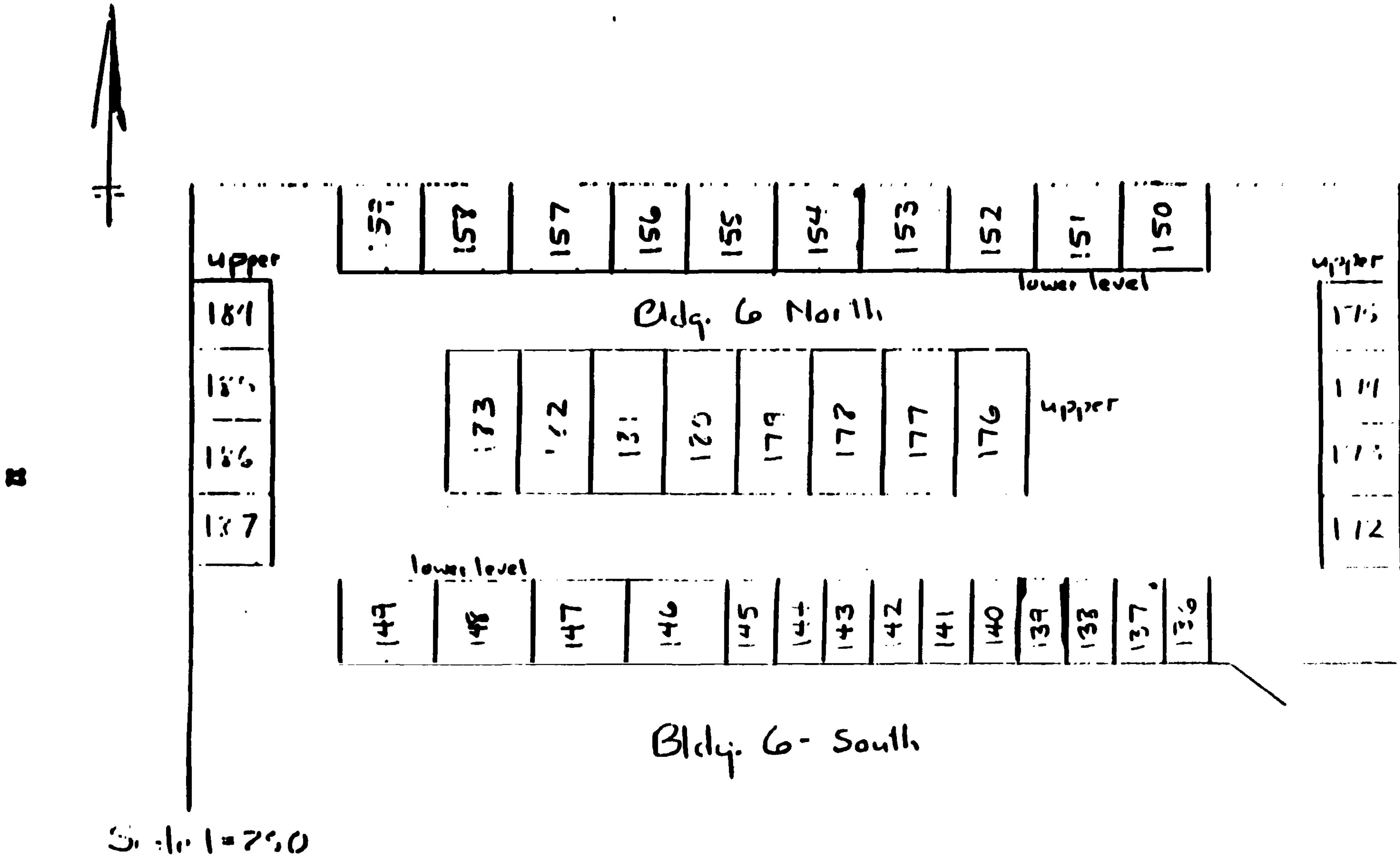
4.2.8 Building 5C

Building 5C was used to store resins. In addition to the eight tanks in this room a portion of the floor is covered with solid resin. Of the eight tanks the IEPA survey lists seven as empty. All tanks have some residue.

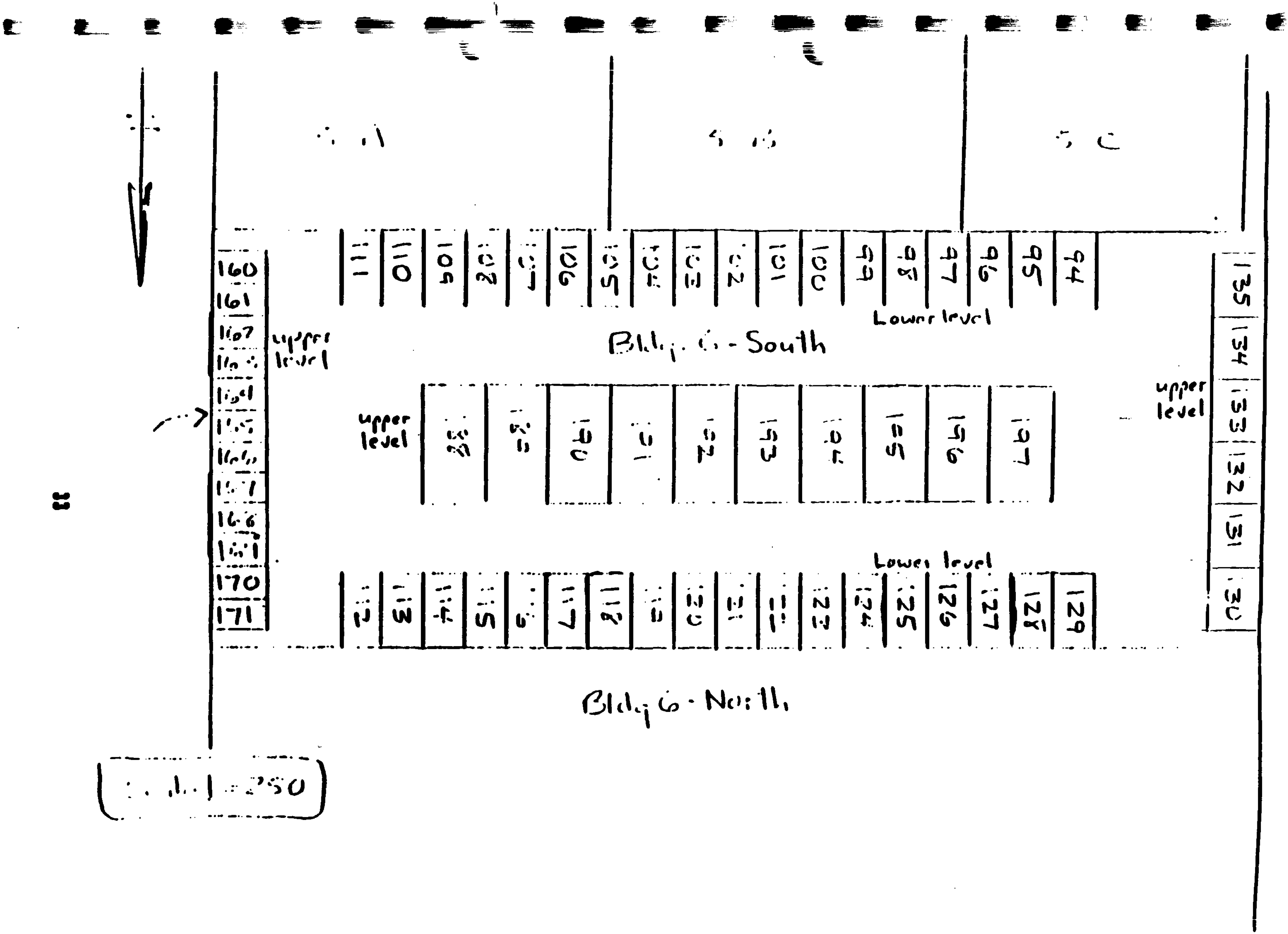
Tanks 198 and 200 have LEL readings of 4% and 12%, respectively. The flash point of Tank 200 is 98°F. and therefore both Tanks 198 and 200 are classed as ignitible.

Tanks 204 and 205 and the sample from the floor have LEL readings of 70%, 37%, and 5%, respectively. The flash point of Tank 204 is 68°F and the flash point of the floor sample is 110°F. All three residues are solids and although they are not ignitible, they are classified as combustible and we recommend that they be removed.

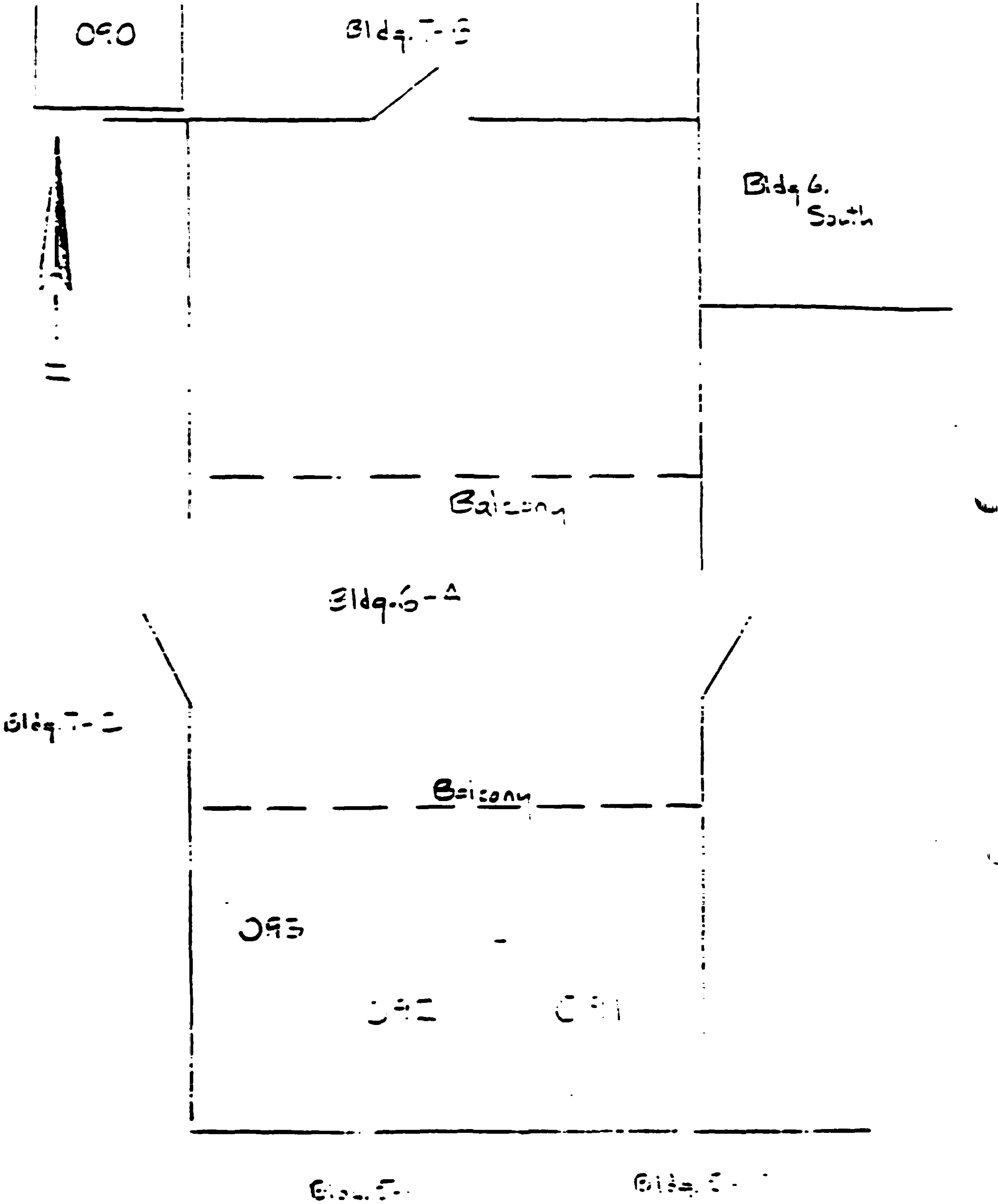
Tanks 199, 201, 202, and 203 have LEL readings of 2% or less and are classified as non-hazardous using the format developed for resins in Building 6.



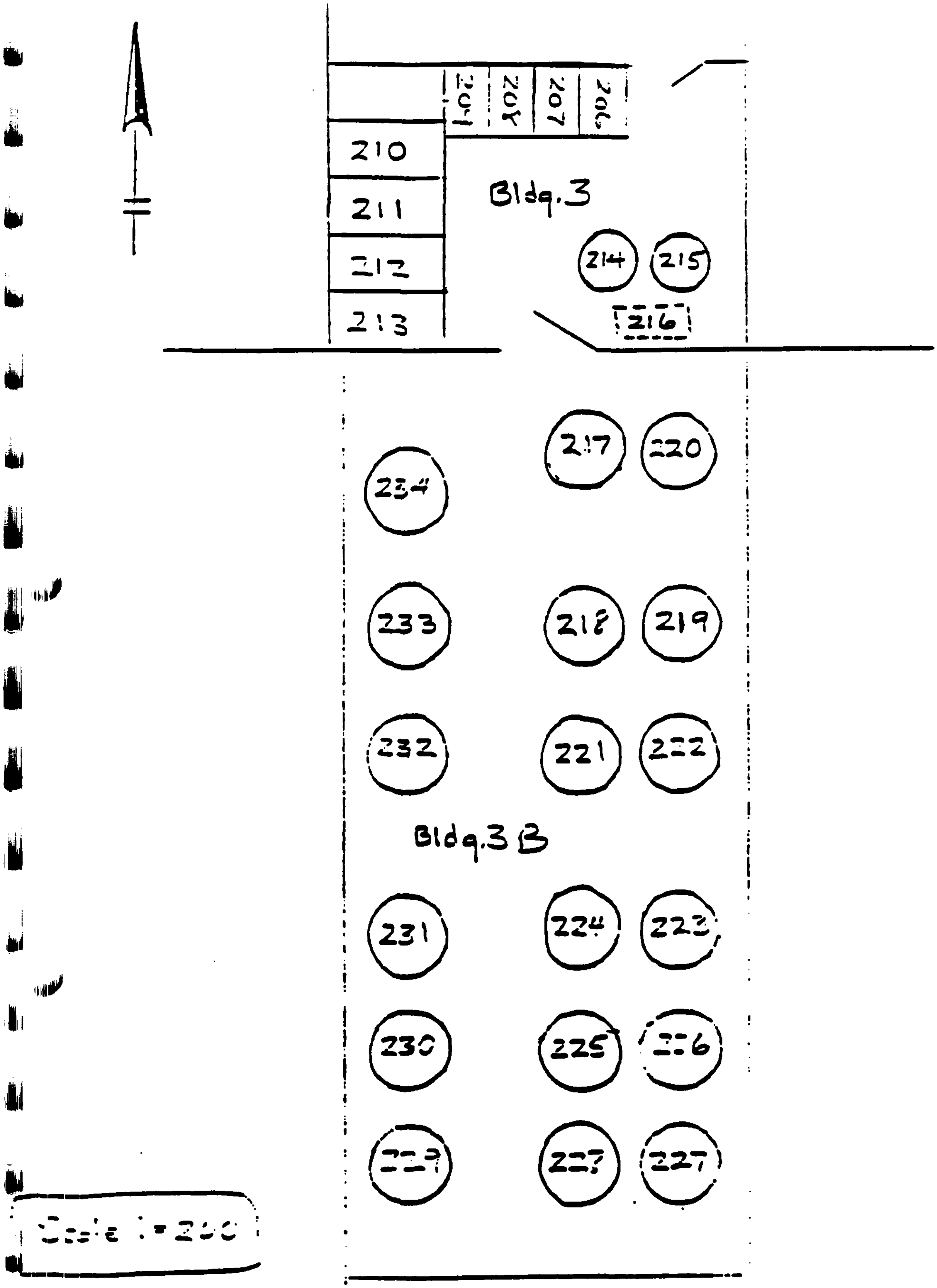
Drawing 1
Resin Storage Area



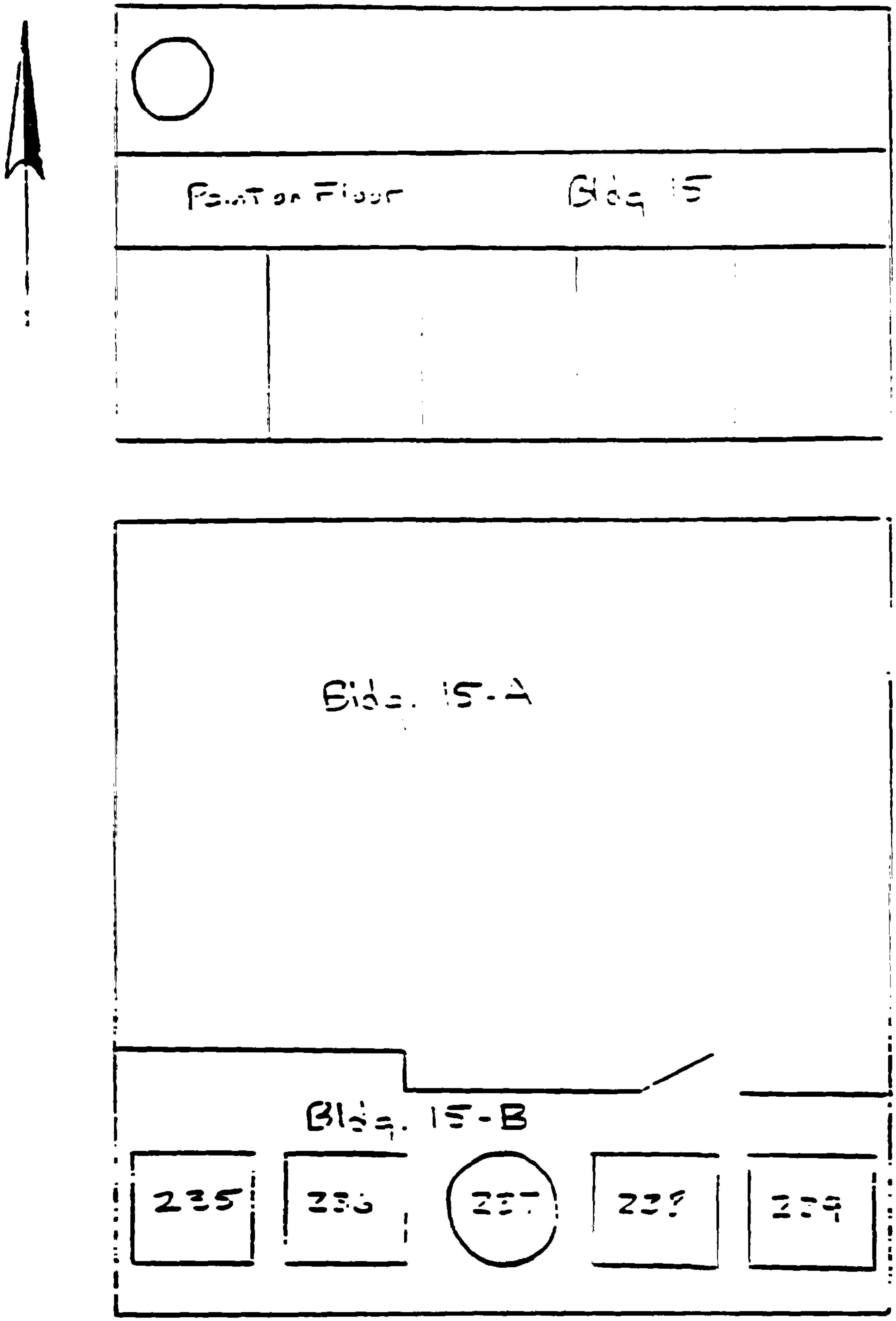
Drawing 2
Resin Storage Area

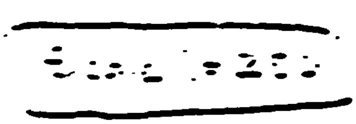


Drawing 3
Resin Storage Tanks

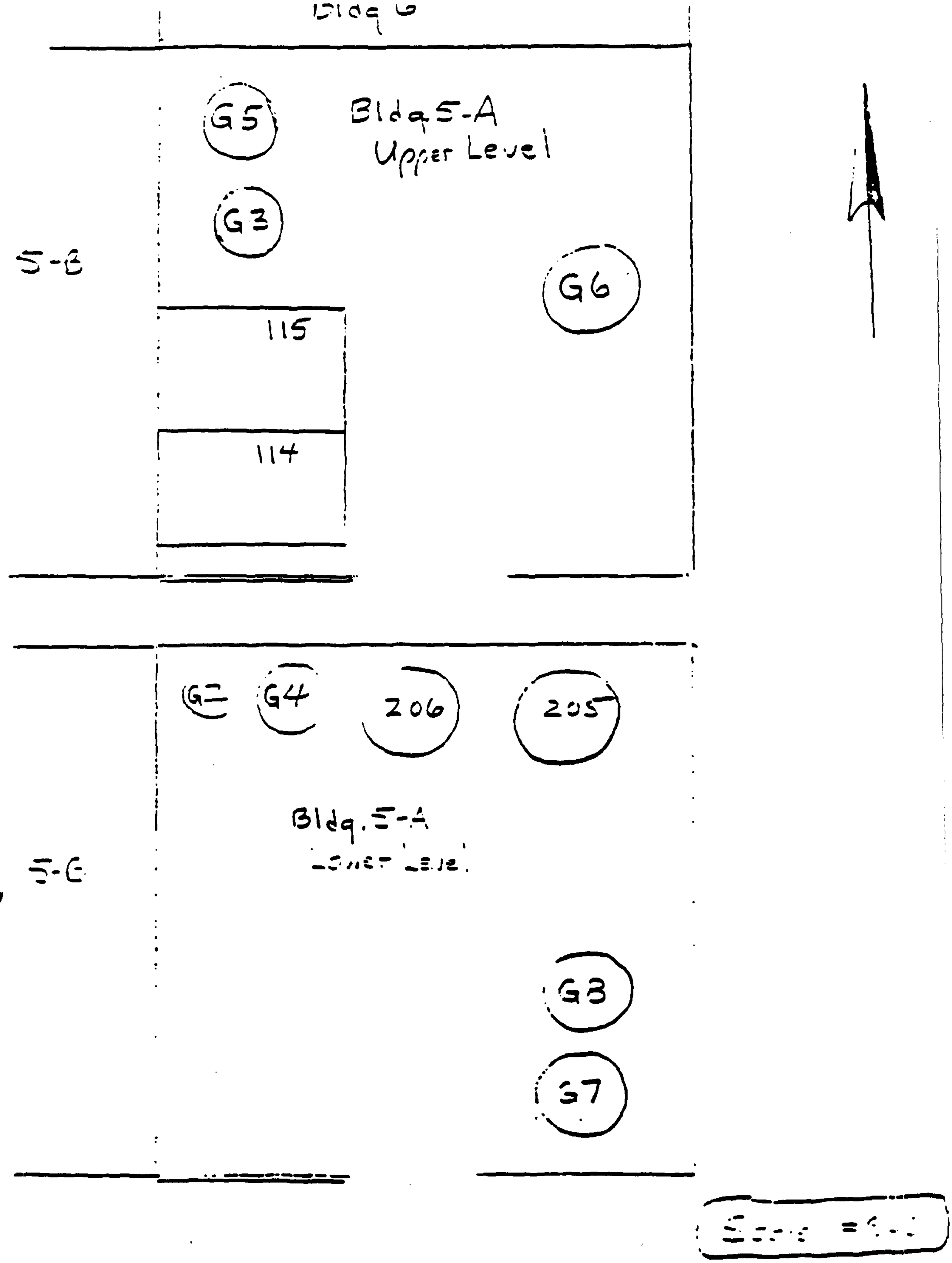


Drawing 4
Resin Storage Tanks

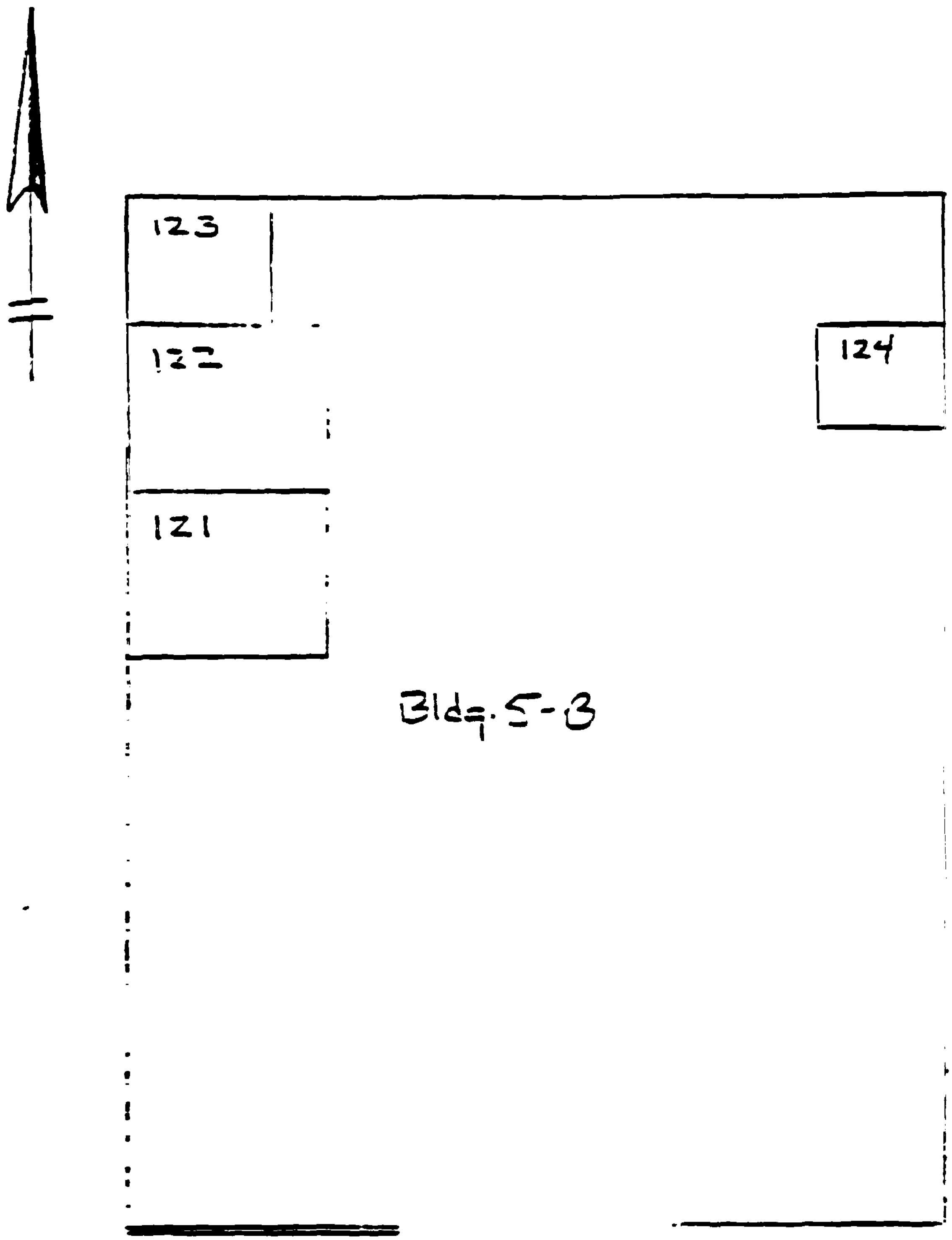




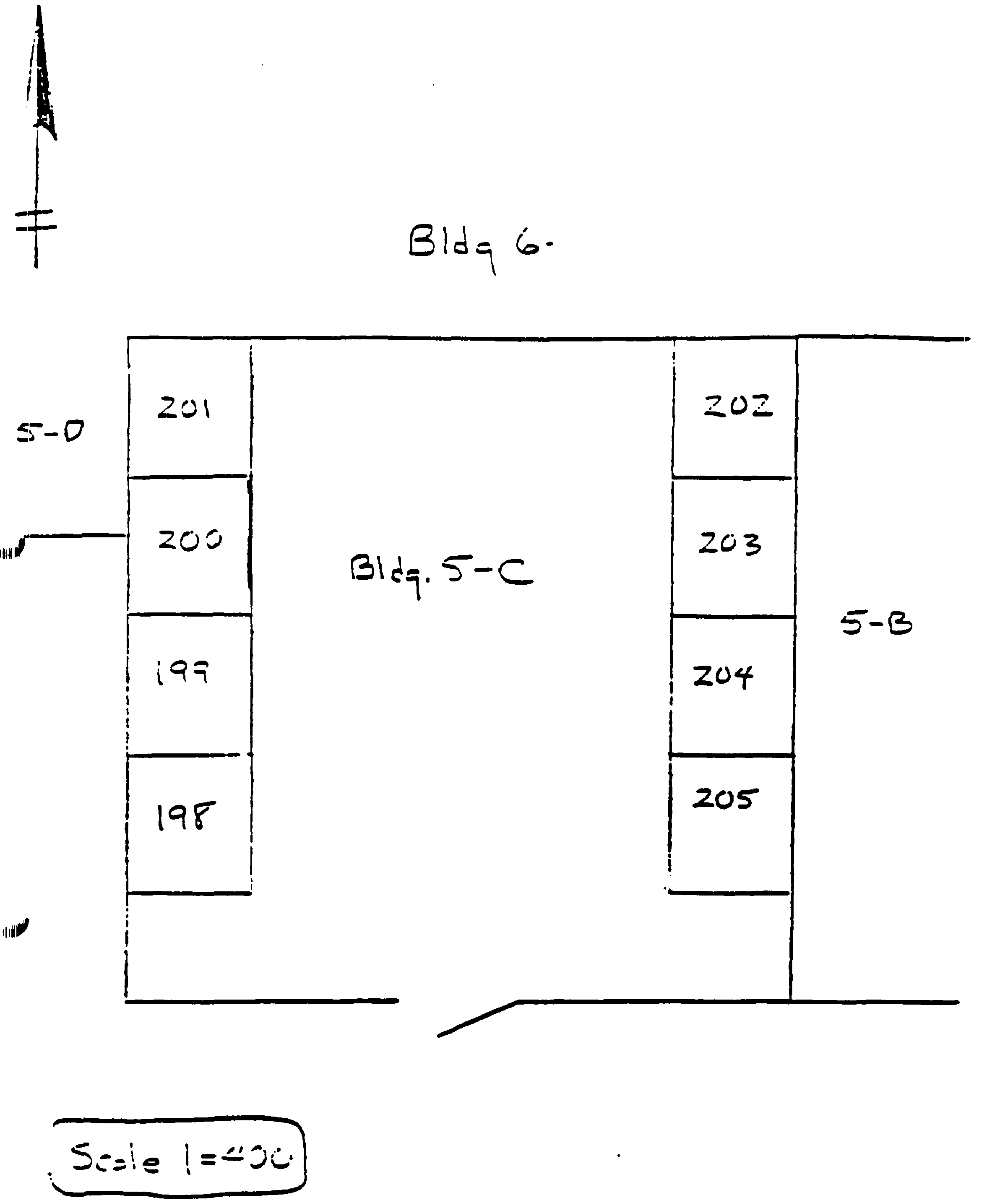
Drawing 5
Resin Storage Tanks



Drawing 6
Resin Storage Tanks



Drawing 7
Resin Storage Tanks



Drawing 8
Resin Storage Tanks

4.3 Underground Tanks

A summary of residues in the underground tanks is presented in Table 4-5. A total of 9,024 gallons of hazardous residue was identified. The characteristics of the tank and residues is described in a series of 5 small scale drawings and the following room-by-room discussion.

4.3.1 Basement, Building 11

The basement of Building 11 is used to store finished goods. There are seven tanks that have been classified by Valspar as underground tanks. None of the tanks were inventoried by the IEPA. Tanks U-18, U-20, U-16, and U-15 are not underground tanks. They are located on a concrete floor and none of the tanks or their associated pipes are buried. These four tanks are empty. According to Valspar personnel they were not used during the time that Valspar was occupying the building. Prior to Valspar's occupancy, the tanks are believed to have contained linseed oil. Tanks U-21 and U-22 are empty. Tank U-23 has about 20 gallons of a very viscous clear resin with a flash pont greater than 215°F. The LEL reading was 0% and metals were present at or below their detection limit. This residue is non-hazardous.

4.3.2 Building 7C

Building 7C has two uses. It was used for empty drum storage. There are two drums in the sump that were reportedly empty drums when they fell in and are now filled with sump water. The other use is that the building covers 10 of 15 underground tanks known as the coopers pit area. These tanks were used to store bulk solvents. Tank 085 was empty. The IEPA survey listed no empty tanks. Most of the tank depths measured by IEPA were within an inch of those we measured. Tanks 080, 082, 089, and 292 all increased in reported depth between measurement dates. Except for Tank 292, these tanks each had standing water on top of them which could enter the fill pipe during heavy rains. Tanks 084 and 085 have decreased in reported depth. They contained very volitile solvents that have evaporated from the tanks. To determine if the tanks are leaking, we recommend that the tanks containing hazardous residues be pressure tested after cleaning.

Valspar has provided a listing identifying the last known contents of the tanks. Flash points and gas chromatography were used to confirm this data and identify the contents of the tanks. Metals and pH were only determined on two samples from this area because these were raw material storage tanks and metals are not expected. The two samples tested were not EP toxic. There were four other samples from other underground tank areas that were tested for metals and they were not EP toxic either.

Tank 083 was identified as a methyl ethyl ketone storage tank. G.C. analysis showed that it was 84% MEK. The remaining 16% is comprised largely of water. If the residues from this tank are disposed of, they are classified as U-159, hazardous waste.

Tank 084 was last used to store recovered solvent. The sample was 70% water and by G.C. it contained eleven solvents accounting for 48% of the weight of the solvent phase. It is principally toluene, zylene, butyl acetate and a high boiler, possibly as mineral spirits. This material is D001.

Tank 290 was last used to store zylene. Phase separation of the sample showed that most of the residue was water. G.C. analysis confirmed that there is still a half of a percent of zylene on top of the water. When disposed of this would be hazardous waste U-239.

Tank 089 was last used to store toluene. The LEL reading of 0% and flash point of greater than 220°F suggests that toluene is not present and the residue in the tank is water. G.C. analysis confirms that there are no solvents including toluene in the water above 0.1%.

The sump is over 10 feet deep. It is filled with water and has two submerged rusting drums stuck sideways near the surface. If there had been solvents in the barrels or if the underground tanks in coopers pit leaked solvents, then one would expect solvents or other contaminates in the sump water. But the water has no detectable metals and an LEL reading of 0%.

All of the remaining tanks were composited for G.C. analysis because most of them were either napthas (080, 087) or water (082, 086, 088, 292, 293) or unknowns (081, 291, 294). The waters would not affect the G.C. results but would separate any alcohols or other water soluables in the unknowns. The napthas of unknown solvents would not interfere with each other unless the unknowns were high boilers. Therefore the results would both characterize the final blend expected when all the solvents were removed for disposal and identify any new solvents in the unknown. There was twice as much naptha found as other solvents and together they account for less than 20% of the composite. Therefore in addition to the five water samples at least half the other samples are principally water. That over ten other solvent peaks were found suggests that the unknowns may include blends such as recovered solvents. If the unknowns contain napthas or mineral spirits, that would also explain the relatively larger amounts of naptha reported. Of the 10 samples composited, all are ignitible hazardous wastes except tanks 086, 087, and 3291. Tank 086 has an LEL reading of 0% and a flash point over 210°F. Tanks 087 and 291 are napthas with a flash point over 140°F.

Tanks 088, 292, and 293 are not an ignitible waste today but they were at an earlier time. The ignitible vapors are still in the tank thus we recommend that the tanks be cleaned up. These tanks last contained mineral spirits and since they are not ignitible they are not D001 unless mixed with ignitible for disposal.

The LEL readings of Tanks 083 and 084 were in excess of 100%. On September 6, 1985, about 250 pounds of nitrogen gas was vented in to each tank to purge the tanks of oxygen. The oxygen was reduced to below 7% and the measured LEL dropped to 55%. The tanks were then sealed and new caps were installed so that the nitrogen could be retained in the tank and also to limit unknowing access to the vapors within the tank.

4.3.3 Underground Storage Tanks - North

There are 15 underground storage tanks located in the north portion of the tank farm. These tanks are outside and are surrounded by a concrete dike on three sides and the foundation of Armstrong Container on the fourth side. Both the IEPA inventory and this inventory list 12 of the 15 tanks as empty. The amount of residue in Tank 245 has increased since the IEPA inventory while the amounts in Tanks 251 and 252 have remained constant. Pipes used to fill or transfer product are above ground and there are no pipes which connect these tanks to the production area.

Tank 245 last contained butyl acetate. G.C. analysis shows that it contains 72% butyl acetate. The solvent has a flash point less than 61°F and is therefore an ignitible waste, D001. Butyl acetate flashes at 72°F. The lower flash of this solvent is probably due to the acetone, ethanol, and MEK which are also present. The LEL reading for this tank was in excess of 100%. On September 6, 1985, 250 pounds of nitrogen gas was vented into the tank to purge the tank of oxygen. The oxygen was reduced to below 3% and the measured LEL was reduced to 10%. The tank was sealed and a new cap was tightly secured to prevent unknowing access to the vapors within their tank.

Tank 252 last contained mineral spirits. It has a flash point of 134°F and is an ignitible waste, D001.

The pipes that service these tanks are above ground. They form a super structure which does not extend out of the diked area. These tanks are no longer connected to the production buildings by pipes. They have been removed.

4.3.4 Underground Storage Tanks - South

There are 18 underground storage tanks located in the south portion of the tank farm. These tanks are outside and are surrounded by a concrete dike on three sides and the foundation of Armstrong Container on the fourth side. Tank 266 contains fuel oil and is in use. It is leased to American Cyanamid. The numbering system used by the IEPA assigned two numbers to each tank, one for the fill pipe and one for the vent pipe. The site maps in Appendix 7 show that there are only 18 tanks, not 34 as listed by the IEPA. With four tanks, the IEPA inventory listed one side as empty and the other side as containing up to five inches of solvents. Tank 276 (274) was listed as having 24 inches of solvent on one side and only three on the other. Tank 264 (265) was listed as empty, yet both Valspar's inventory which was before the IEPA study and our inventory found six inches of mineral spirits. Of the 18 tanks, one is leased, two are empty, and the remaining 15 have residues.

Tanks 260, 263, 258, 264, 275, 272, 289, 276, 279, and 277 were last known to contain mineral spirits. They were combined into composite B. The chromatagram for composite B accounted for only 5% of the sample. Due to problems in obtaining a specific mineral spirit standard, quantification of the mineral spirit data is very poor. This does show that there are no other solvents present. Tanks 260, 263, 264, 289, 272, 275, 276, and 279 have flash points less than 140°F. Therefore all eight are ignitible waste D001 when disposed of. The flash points for tanks 258 and 277 are above 140°F and therefore they are not ignitible wastes.

Tanks 256 and 287 were sampled from both the fill pipe and the vent pipe. The fill pipe samples appeared to be the same as from the vent pipes. Individual flash point determinations were within one degree for 286/287 but were 15° apart for 256/257. The four samples were composited in composite X and by G.C. There were no solvents detected. Due to their high flash points, these residues are non-hazardous.

Tanks 269 and 283 last contained varnishes. Their samples were combined and called the Varnish composite. Both samples flashed over 140°F and the composite showed low enough levels of metals that even if all of the metal leached in a test, there was not enough to exceed the EP toxic limit. These residues are non-hazardous.

Tank 288 was also sampled from the fill pipe and the vent pipe. The flash points were both below ambient temperatures. G.C. of both samples showed enough variation to suspect that one of the samples was not representative of the contents of the tanks. One of the pipes extended deep into the tank and the portion of the tank's contents that were contained by the pipe have aged at a different rate than the rest of the contents of the tank.

Tank #	Spl. #	Toluene	Xylenes	MEK	Butanol	Ethyl Benzene	Mineral Spirits
288	52	41%	11%	0.6%	1.1%	3.8%	14%
285	57	26%	5.3%	0.6%	1.1%	4.8%	14%

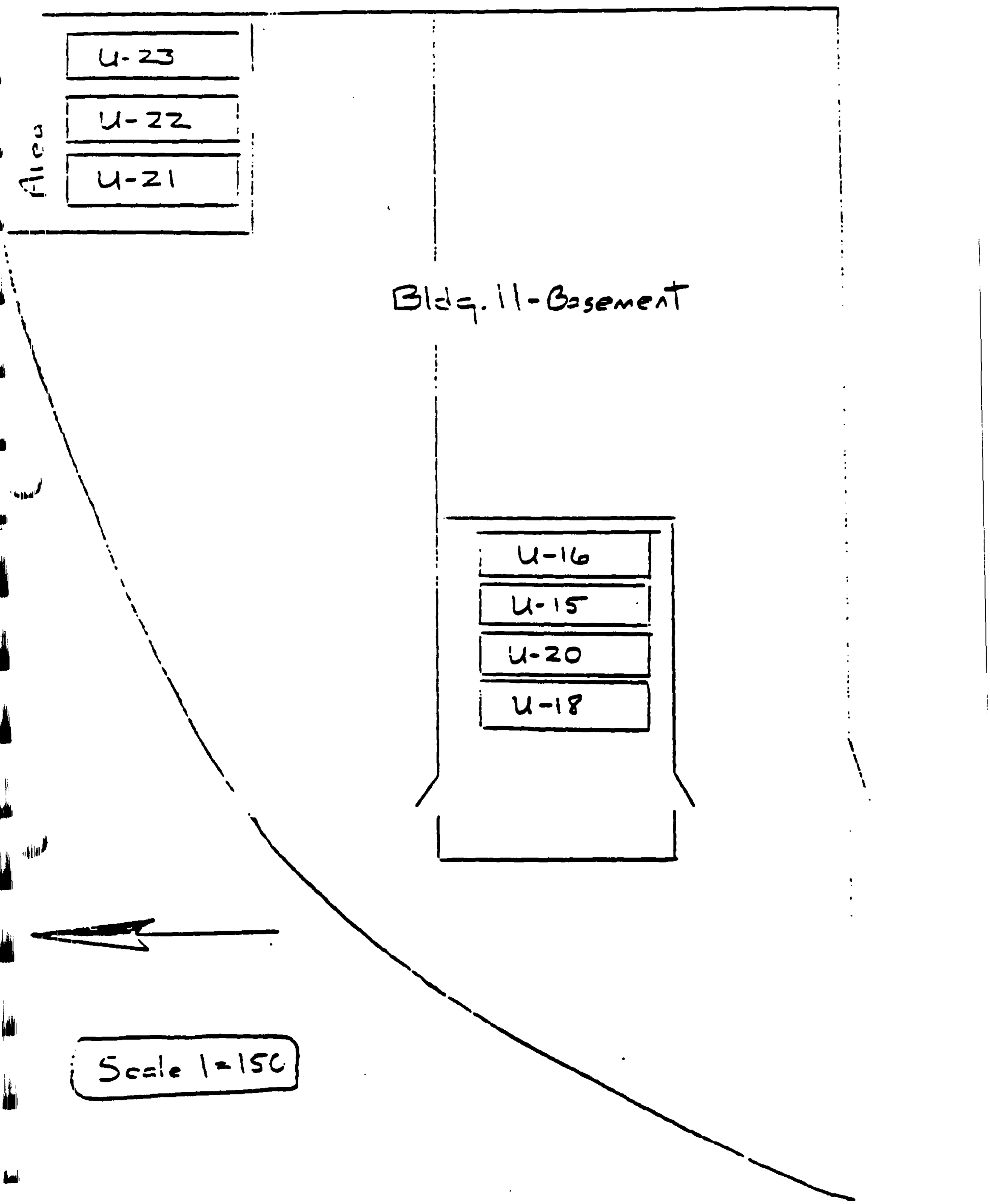
Due to the low flash, this material is an ignitible waste, D001.

The LEL of Tank 288 was over 100%. On September 6, 1985, 250 pounds of nitrogen gas was vented into the tank to purge the tank of oxygen. The tank was sealed and capped to prevent unknowing access to the vapors within the tank.

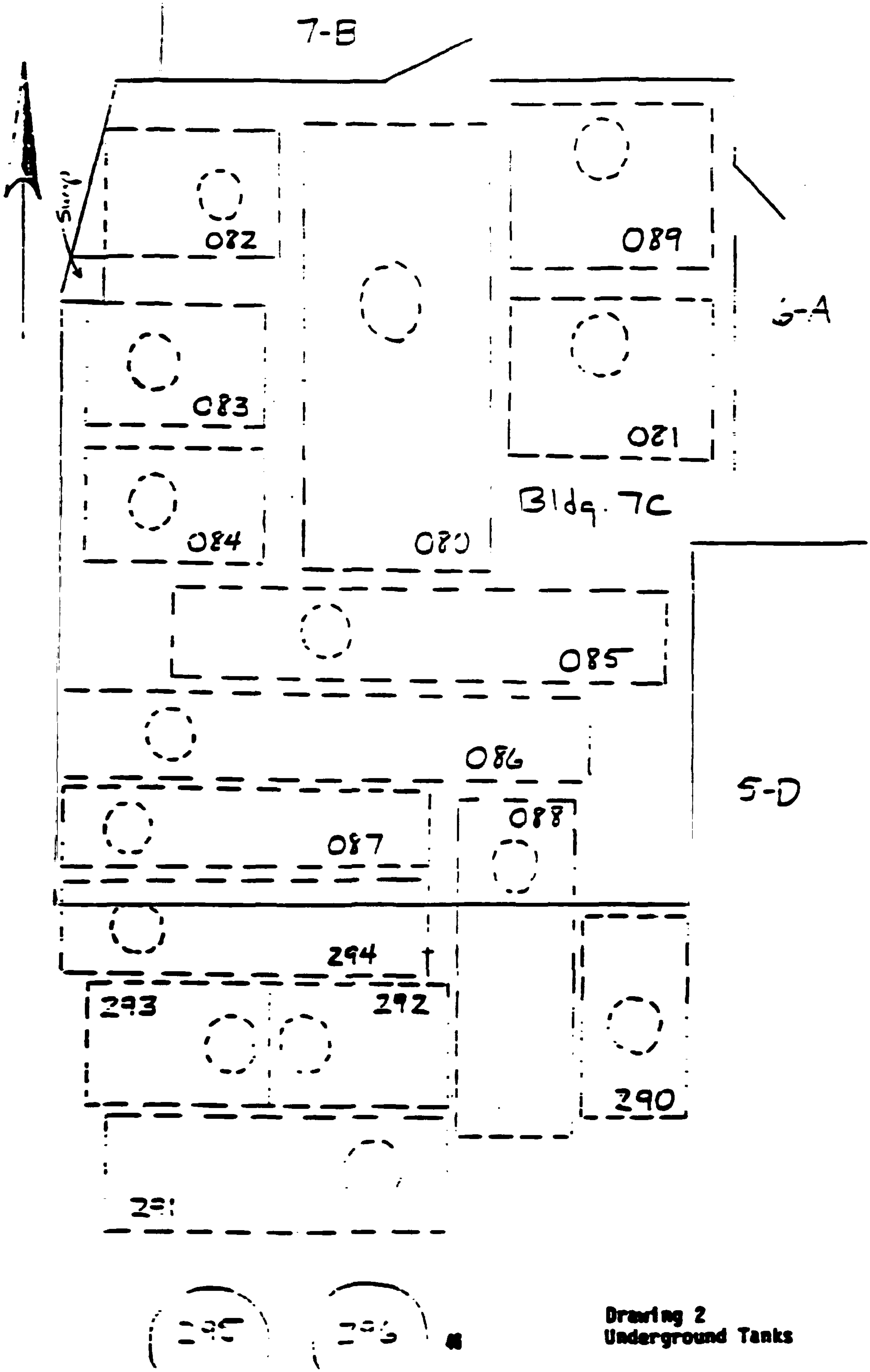
4.3.5 Outside Building 9C

Outside Building 9C are three underground fuel oil tanks and a shed with asbestos pipe insulation. These tanks and the shed were not included in the IEPA inventory. Tank U-62 is empty. Tanks U-63 and U-64 both contain fuel oil. Tank U-63 was sampled and the flash point was determined to be 186°F. The fuel oil is not a hazardous waste.

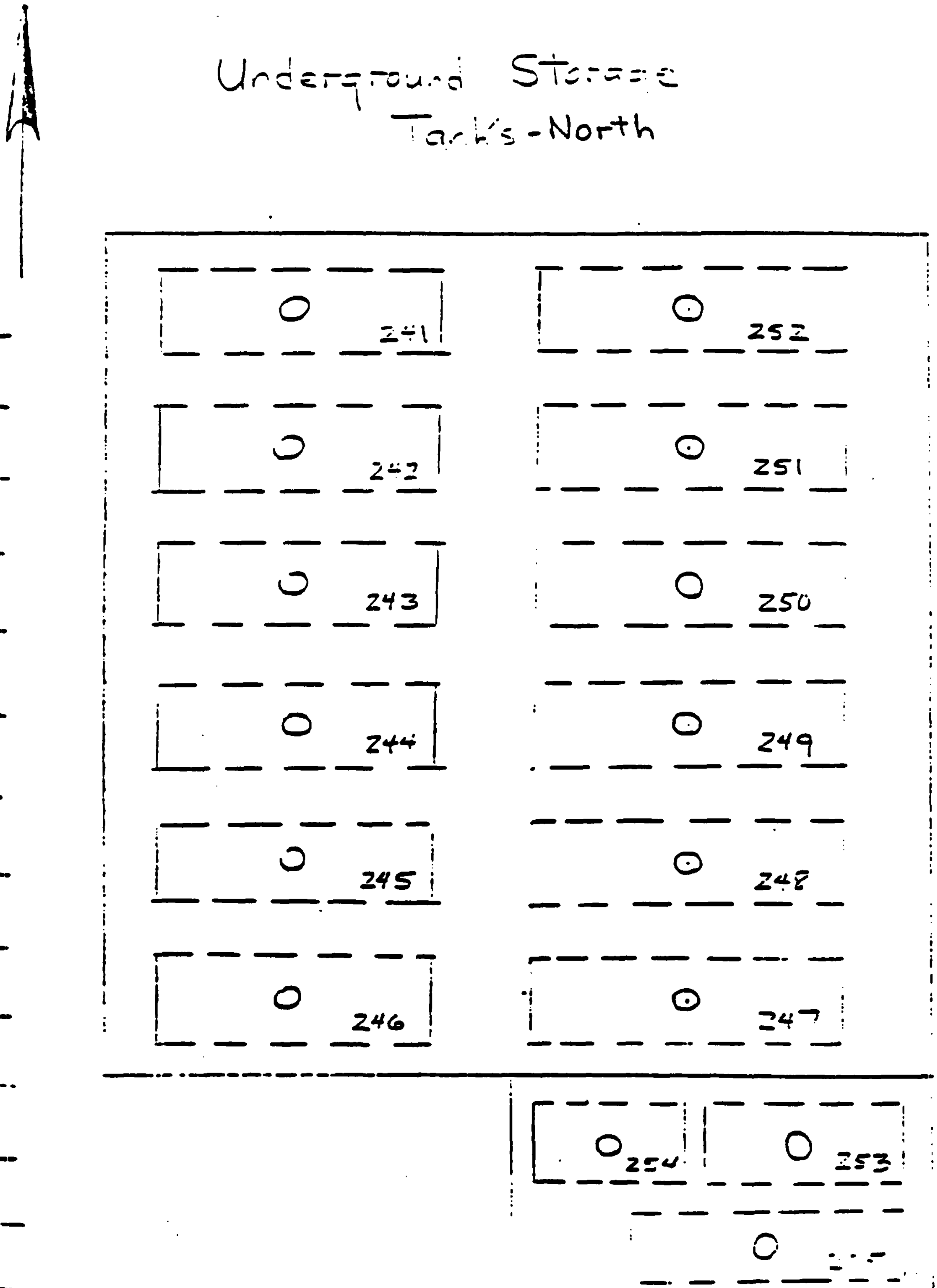
The shed was eight feet wide and 10 feet deep and a fourth full of unused pipe insulation. Some of the insulation was fiber glass and some was Asbestine brand asbestos insulation.



Drawing 1
Underground Tanks

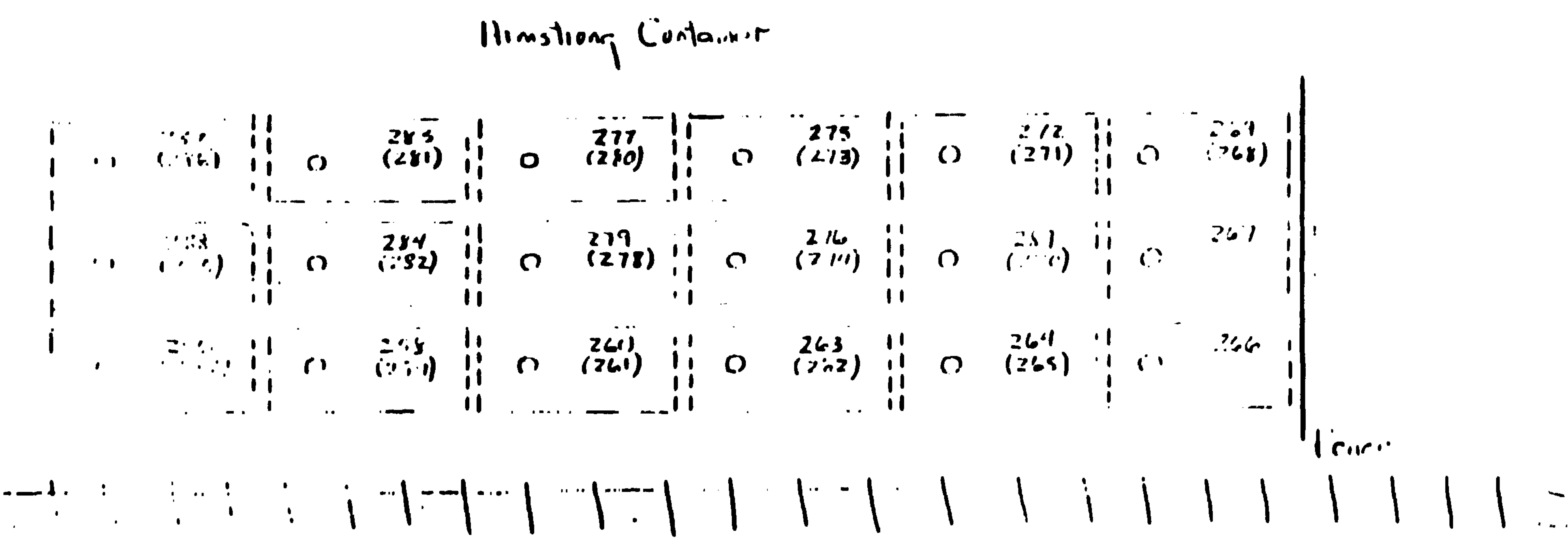


Drawing 2
Underground Tanks

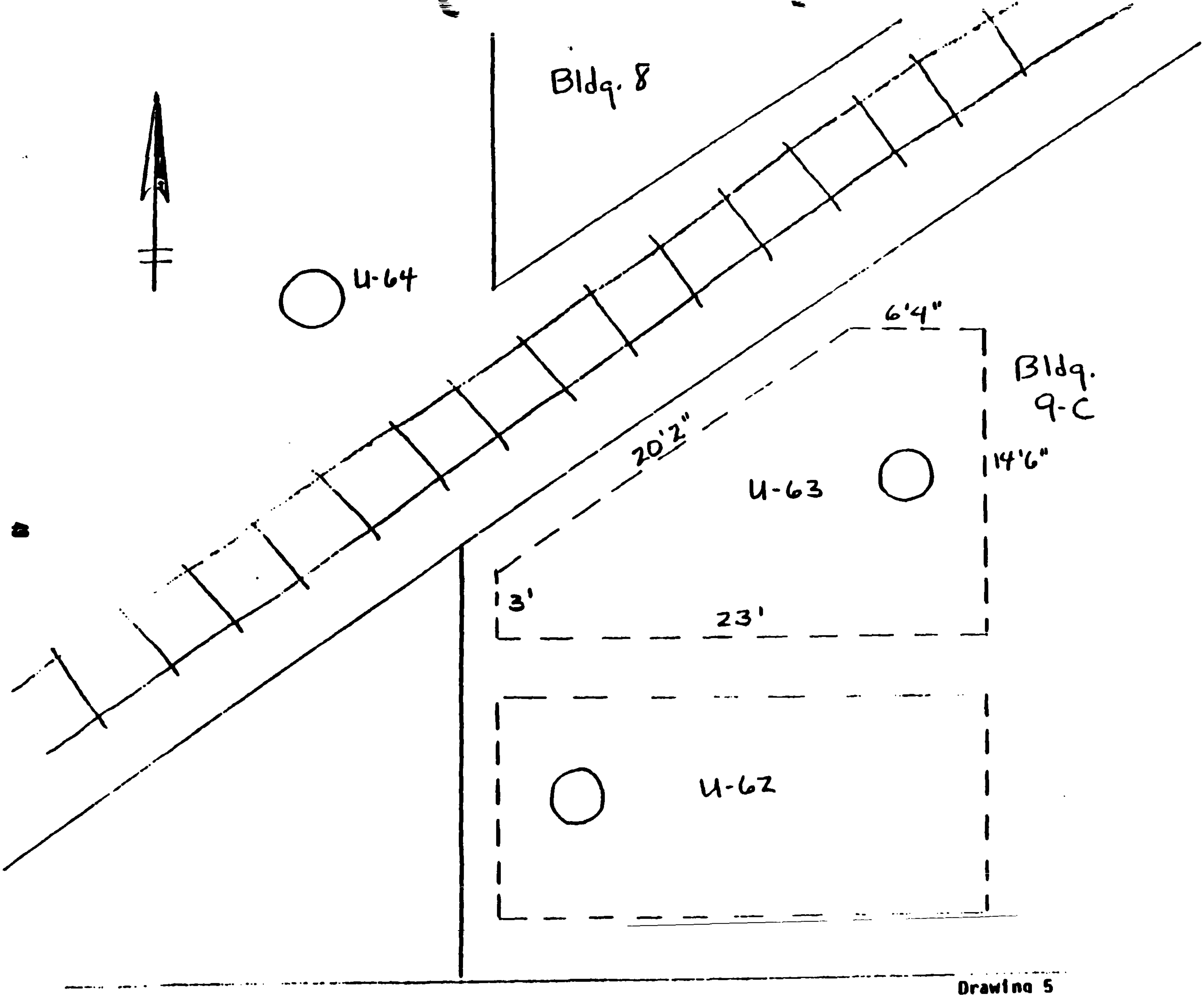


Drawing 3
Underground Tanks

Underground Storage Tanks - South



Drawing 4
Underground Tanks



Drawing 5

5.0 FINDINGS

5.1 Identification of Materials in Tanks

The wastes and materials found were all typical of the paint production industry. The only potential inconsistency was that chlorinated hydrocarbons were reported in the G.C. analysis, yet Valspar did not use them. The gas chromotograph (G.C.) analysis was qualitative to the extent that the peaks found were indeed one of the 50 standards that were run by the lab. But there are over 5,000 materials used in the paint industry to formulate paint, and many of them are boiling point range solvents like mineral spirits which contain many related chemical components resulting in numerous peaks on the G.C. In one instance the lab reported that sample #73 was 100% carbon tetrachloride. When that was questioned, they reran the sample and changed it to 100% tetrachloroethylene. That was challenged by demonstrating the sample was very combustible. We told them that the tank reportedly contained butanol. They obtained a butanol standard and confirmed that the sample was 65% butanol and 35% water. Butanol coeluted with carbon tetrachloride and tetrachloroethylene. Both of these chlorinated hydrocarbons also show up at low levels in four other samples. The widespread use of butanol suggests that those peaks are also butanol.

Other chlorinated hydrocarbons show up in two types of other samples. These are samples containing mineral spirits and napthas or samples containing recovered solvents that also have mineral spirits and napthas as components. Due to the low levels of these reported chlorinated hydrocarbons, they are most likely coeluting chemical components of the mineral spirit type of solvent.

5.2 Amounts of Hazardous Materials in Tanks

Table 5.1 summarizes the number of tanks with hazardous residues and the total volumes of each type of hazardous waste. Combustible solids are included as hazardous wastes because they will be mixed with hazardous resins for disposal by incineration. Tanks with resins that are less than 0.3% of their capacity are considered empty.

Table 5.1

	Tanks				Hazardous Residues (gallon)		
	Total # of tanks	# of haz. res. tanks	Empty less than 0.3%	# to be cleaned	liquids	solids	combustible
Production	99	23	8	15	195	22	105
Resin	107	47	5	42	1,144	0	1,905
Underground	59	22	2	20	8,989	0	0
Total	328	92	15	77	10,328	22	2,010

Table 5.2 expands these volumes to the amounts that disposal charges would be based upon. The amounts in Table 5.1 are based on

measurements of tanks as the material is but when solids are removed and placed in drums they will take up more space because their irregular shapes will allow spaces within the barrel to exist. This "fluff" factor is assumed to be 20% for solids. Liquid volumes will be increased due to recovery of liquids from pipes and the creation of liquid cleaning fluids.

The criteria for when a tank is empty is not clear. There are no numerical standards. Although 92 tanks do have some residue, some of those tanks contain less than a gallon. The average depth of the residues in the resin and production tanks is 1.5 inches. The average depth in the underground tanks is 8.4 inches. A breakdown of the depths of residues follows:

over 6 inches	13 tanks	14%
3 inches to 6 inches	11 tanks	12%
1 inch to 3 inches	35 tanks	38%
less than one inch	33 tanks	36%

A 55 gallon drum of characteristic or F listed waste is considered empty at 1 inch (40 CFR §261.7 (b)). Containers of more than 110 gallons are considered empty if they contain no more than 0.3% by weight. A comparable amount for an average 8,000 gallon tank is 24 gallons or about 1.5 inches if on its side. Using the 0.3% standard for empty classifies 16% of these tanks as empty. This standard is appropriate for the open tanks in the production and resin storage areas because the liquids have already been removed and the combustible solids and the thin layers of liquids that remain offer no explosive hazard. But the presence of combustible vapors over 20% LEL in the closed underground tanks is a potential hazard and we recommend that it be eliminated because of the explosion potential. There would be 15 tanks in production, 42 tanks in the resin area, and 20 tanks in the underground storage area that were not empty. Most of the underground storage tanks have taken in water since Valspar left and would have been empty at the time they left. Most of the tanks in the production area and the resin area with more than 0.3% are solids and although combustible, they are not hazardous waste.

Table 5.2

Volumes for Disposal

Solvents	9,024 - 3,971 gallons useable mineral spirits, etc.	= 5,053 gal.
Solids	2,032 x 1.20 expansion factor (barrels)	= 2,438 gal.
Mixtures	1,339 x 1.20 expansion factor (barrels)	= 1,607 gal.
Drums	(10)	= 550 gal.
Steam cleaning condensate (100 gal. per tank)		= 3,400 gal.
Resin removed from pipes (200 ft. of 2" per tank) (32 gal.)		= 416 gal.
To be incinerated or treated		13,464 gal.
To be recycled (useable mineral spirits)		3,971 gal.
To be landfilled (asbestos)		5 yards

5.3 Hazardous Materials in Pipes

The pipes in the production and underground area are assumed to be generally drained clear. By blowing air through the pipes, this will be confirmed in Phase II. Flash points will be determined on liquids removed from the pipes and hazardous liquids will be disposed of. The volume is expected to be very low. There are only two pipes that are known to still contain solvents and their volumes are estimated at less than 50 gallons collectively.

Many of the pipes in the resin areas are not open and drained. We recommend that the pipes to and from the 14 tanks containing ignitible residues be removed and any ignitible residues cleaned out. Each tank has an estimated 200 feet of 2" ID pipe. If all of the pipe is full, then 32 gallons per tank will be removed. The total is 450 gallons. The pipes would be steam cleaned and sold as scrap metal.

5.4 Peeling Paint and Spills

The floors of three buildings (3B, 15, and 5C) had areas that were soft and sticky. Analysis showed that none of the materials in these areas were hazardous. But the material in Building 5C was combustible and although it was a solid, it had a flash point. Therefore, we recommend that the area be cleaned up and the residues incinerated with the ignitible resins.

The peeling paint in the production area was mostly the same off white latex. There were small areas of blue, red, and green on doors and marking fire extinguishers and safety equipment. These colors were also collected and composited with the white at an approximate 50% white, 50% color. Chromium and lead were present but they were not EP toxic, and the peeling paint is not a hazardous waste.

6.0 SITE CLEAN UP PLAN

6.1 Work Elements for Production Area

Work will be conducted using level C protection and will consist of the following elements:

- Pump liquids into drums.
- Enter and scrap tank residue into drums.
- Steam clean the tanks.
- Collect condensate in drums.
- Blow air through pipes. If not clean, then trace the pipe to downstream valves and open and collect residues in drums. Steam clean the pipe if residues were removed.
- Dispose of residues.

6.2 Work Elements of the Resin Storage Area

Work will be conducted using level C protection for method (a) of cleaning and level B protection for method (b) of cleaning. Method (a) will be tried first and if it doesn't work, then method (b). Some of the resin may be too sticky for method (a) to be effective.

Method (a)

- Cut the residue from the tank with high pressure steam.
- Hoe out the pieces into drums.
- Steam clean the tank.
- Collect condensate in drums.
- Cut pipes and remove valves and pumps.
- Collect contents of pipes in drums.
- Dispose of residues, including 10 drums of resins left in the area.

Method (b)

- Three-man teams with one to enter the tank from above and scrape up residue, one to assist for safety on top of the tank, and one to hoe out the residue into drums.
- Steam clean the tank and collect condensate in drums.
- Dispose of residues, including 10 drums of resins left in the area.
- Cut and clean the pipes as in (a).
- Dispose of residues.

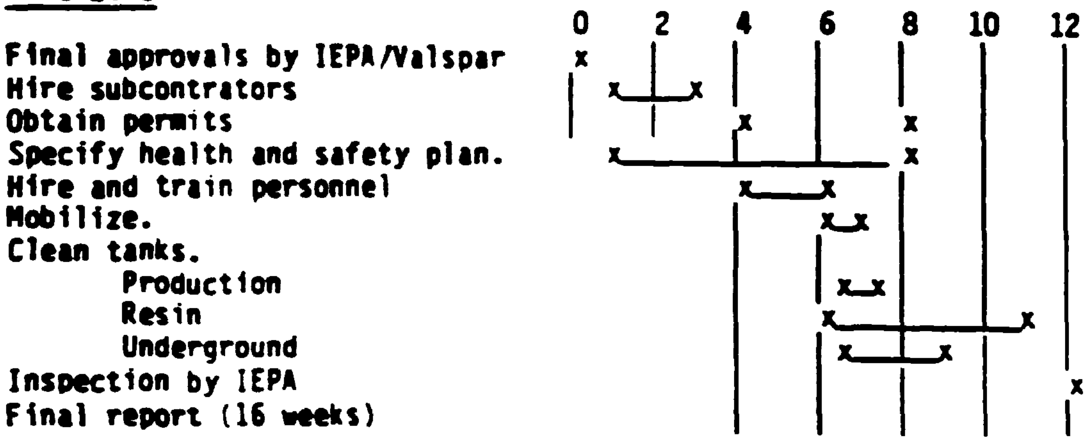
6.3 Work Elements for the Underground Tanks

In order to complete the cleaning of these tanks, the manhole cover must either be removed or a hole must be cut into the tank. Level B protection will be used by anyone entering the tanks. At other times Level C protection will be used.

- Pump liquids from tanks into tank truck for transportation off site.
- Seal the tank and pressure test for leaks.
- Open manhole.
- If manhole cannot be removed, purge tank with liquid nitrogen and cut a hole at least 2' x 2".

- Vent the tank with fresh air.
- Steam clean the tank.
- Pump out condensate.
- Enter and scrape up residue into drums.
- Blow air into pipes and remove solvents. Steam lines that were found with solvents.
- Dispose of residues.
- Authorize firm to package asbestos waste for disposal.

6.4 Time Line



Due to the lack of power, water, and heating on site, not only will inclement weather increase the cost and time required to complete the tasks, but, if severe enough, the weather can bring the project to a stop.

Table 4-1A

FIELD AND LABORATORY DATA SUMMARY

PROCESSING TANKS

Tank ID		EPA Data		Field Data			Laboratory Data					Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combustibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
--	309	--	--	0	21								
076	--	>210°	6	0	21								
070	--	>200°	9	0	21								
071	--			0	21								
(069)	--			0	21								
072	--			0	21								
073	--			0	21								
074	--			0	21								
075	--	105°	6	2	21		C	1	149°	No		D001	X
068	--	>200°	11	0	21		N	77		No	11		X
030	27			0	21		N	5	>210°	No	10		X
031	26			0	21								
032	25			0	21								
033	24			0	21								
034	23			0	21								
035	22			0	21								
036	21			0	21								
037	20			0	21								
038	19			0	21								
039	18			0	21								
040	17			0	21								
041	16	85°	6	4	21		VC	4	< 65°	Yes		D001 D008	
042	15	95°	7	0	21	15	C	3	116°	Yes		D001 D008	
043	14			0	21								
044	13			0	21								
045	12			0	21								
046	11			0	21								
047	10			0	21								
048	9			15	21		C	2	125°	No		D001	
049	8			0	21								X
10 gal. Bldg. 7 can	3rd Fl						N	10	>210°		4		X

Table 4-1A

FIELD AND LABORATORY DATA SUMMARY

PROCESSING TANKS

(Continued)

Tank ID		EPA Data		Field Data		Laboratory Data						Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab ID#[4]	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
050	7			0	21								
051	6			0	21							D001	
052	5			0	21							D001	
053	4			0	21	6-15	VC	6	119°	No		D001	
054	3			0	21			Com-				D001	
055	2			0	21		te	posite				D001	
056	1			0	21							D0U1	
057	33			0	21								
058	34			0	21								
059	35			0	21								
060	36			0	21								
061	37			0	21								
062	87			0	21								
063	38			0	21								
064	39			0	21								
065	40			0	21								
066	41			0	21								
067	90	>210°	9	0	21		N	> 7	210°	No	9		X
008	84			0	21								
009	83			0	21								
010	82			0	21								
011	81			0	21								
012	79			0	21								
013	78			0	21		N	> 8	210°	No	7		X
014	77			0	21								
015	76			0	21								
016	75			0	21								
017	74			0	21								
018	73			0	21								
019	72			0	21								
020	71			0	21								
021	70			0	21								
022	69			0	21								

Table 4-1A

FIELD AND LABORATORY DATA SUMMARY

PROCESSING TANKS

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data				Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
023	68			0	21								
024	67			0	21								
025	66			0	21								
026	65			0	21								
027	64			0	21								
028	63			0	21								
029	62			0	21								
-	29			0	21								
"CAUSTIC" on 3rd floor of Bldg. 12				0	21		N	9	>200°	No	11		X
005	--			0	21								
006	--			0	21								
Oil, Elect. Equipt.				0	21		VC	15	>210°				X
Bldg. 10 - 2nd floor				0	21								
001	--			0	21								
002	--			0	21								
003	--			0	21		N	14	>210°	No	1[illegible]		X
004	--			0	16								X
--	CT1			0	21								X
--	CT2			0	21		N	12	>210°	No	10		X
--	CT3			0	21		N	13	>210°	No	1[illegible]		X
30 gal.													
Bldg. 10 - 1st floor				0	21								
007	--			0	21		N	16	>210°	No	[illegible]		X
077	--			0	21								
078	--	>210°	6	0	21		N	11	>210°	No	7		X
079	--			0	21								X
Peeling Paint				0	21			25		No			X
Portable Vats													
Bldg. 13 - 1st floor				0	21		C	85	139°	No			

Table 4-1A

FIELD AND LABORATORY DATA SUMMARY

PROCESSING TANKS

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data				Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No

<u>Footnotes</u>

1. Lower explosive limit measured as the % LEL in the tank.
2. Lower explosive limit measured as the % LEL at the surface of the residue
3. Combustibility measured qualitatively based on ability of material to burn.
   VC = very combustible, readily burns when exposed to an open flame.
   C = combustible, burns only after residue has been heated.
   N = noncombustible
4. Laboratory identification number assigned to samples collected.
5. Flash point in F°, as determined by procedures outlined in Appendix 5. Analysis performed by James A. Kinsey.
6. Evaluation of Pace Laboratory, Inc. analytical results presented in Appendix 6 in terms of EPA hazardous waste rules.
7. Overall hazard determination and EPA hazard identification number.

Table 4-18

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE

Tank ID		EPA Data		Field Data			Laboratory Data					Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus- tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
094	30			0	21	-							
095	29			0	21	-							
096	28			0	21	-							
097	27			0	21	-							
098	26			0	21	0							X
099	25			0	21	-							
100	24			0	21	0							X
101	23			0	21	5						0001	
102	22			0	21	-							
103	21			0	21	0							X
104	20			0	21	0							X
105	19			0	21	0	C	19	>210°	No			X
106	18			0	21	0							X
107	17			0	21	0							X
108	16			0	21	5	VC	18	132°	No		[illegible]	
109	15			0	21	-							
110	14			0	21	-							
111	13			0	21	-							
112	54			0	21	-							
113	53			0	21	0							X
114	52			0	21	3						0001	
115	51			0	21	14						0001	
116	50			0	21	15						0001	
117	49			0	21	6						0001	
118	48			0	21	4						0001	
119	47			0	21	-							
120	46			0	21	-							
121	45			0	21	5						0001	
122	44			0	21	2							X
123	43			0	21	7						[illegible]	
124	42			0	21	7	VC	22	109°	No		0001	
125	41			0	21	22						0001	
126	40			0	21	36	VC	21	< 75°	No		[illegible]	
127	39			0	21	8						[illegible]	

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data				Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
128	38			0	21	15						D001	
129	37			0	21	15	VC	20	< 75°			D001	
130	36			0	21	-							
131	35			0	20.8	0							X
132	34			0	21	0							X
133	33			0	21	-							
134	32			0	21	-							
135	31			0	21	-							
160	12			0	21	-							
161	11			0	21	-							
162	10			0	21	-							
163	9			0	21	-							
164	8			0	21	0							X
165	7			0	21	-							
166	6			0	21	0							X
167	5			0	21	-							
168	4			0	21	-							
169	3			0	21	15						D001	
170	2			0	21	18						D001	
171	1			0	21	8						D001	
188	106			0	21	0							X
189	105			0	21	0							
190	104			0	21	2							X
191	103			0	21	-							
192	102			0	21	-							
193	101			0	21	-							
194	100			0	21	1							X
195	99			0	21	15	VC	28	106°	No		D001	
196	98			0	21	0							X
197	97			0	21	0							X
B-508	—	130°	6										X
B-503	—	85°	6	4	21		C	44	99°	No			X
B-502	—	<80°	6	35	21		VC	50	82°	No			X
B-504	—	>210°	6	35	21								X

Table 4-16

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data				Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
136	55			0	21	0							X
137	56			0	21	5						D001	
138	--			0	21	22						D001	
139	60			0	21	55	VC	29	< 74°	No		D001	
140	61			0	21	5						D001	
141	62			0	21	8						D001	
142	63			0	21	2							X
143	64			0	21	3						D001	
144	65			0	21	0							X
145	66			0	21	2							X
146	67			0	21	3						D001	
147	68			0	21	5						D001	
148	69			0	21	5						D001	
149	70			0	21	0							X
150	75			0	21	5						D001	
151	76			0	21	8	VC	46	125°	No		D001	
B-151	Bucket			0	21	8	C	42	117°			D001	
152	77			0	21	2							X
153	78			0	21	38	VC	47	69°	No		D001	
B-153	Bucket			0	21	38	VC	45	89°	No		D001	
154	79			0	21	28						D001	
155	80			0	21	13						D001	
156	81			0	21	38						D001	
157	82			0	21	24						D001	
158	83			0	21	7						D001	
159	84			0	21	0							X
172	85			0	21	4						D001	
173	86			0	21	2							X
174	87			0	21	2	C		>210°	No			X
175	88			0	21	0							X
176	89			2	21	2							X
177	90			3	21	1						D001	
178	91			12	21	5						D001	
179	92			0	21	0							

Table 4-1b

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE

(Continued)

Tank ID		EPA Data		Field Data					Laboratory Data			Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combustibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
180	93			2	21	2							X
181	94			2	21	0							X
182	95			4	21	1						D002	
183	96			0	21	0							X
184	74			0	21	3						D001	
185	73			0	21	-							
186	72			0	21	-							
187	71			0	21	-							
091	--	>210°	6	0	21	0	N	23	>210°	No	6		X
092	--	>210°	6	0	21	0							
093	--			0	21	-							
090	--	>220°	12	0	21	0	N	82		No	12		X
206	138			0	21	-							
207	139			0	21	-							
208	(140)			0	21	-							
209	141			0	21	-							
210	142			0	21	-							
211	143			0	21	-							
212	145			0	21	-							
213	146			0	21	-							
214	(137)			0	21	-							
215	(136)			0	21	-							
216	(135)			0	21	0							X

Table 4-18

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data				Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
217-	148			0	21								X
218	151			0	21								X
219	150			0	21								X
220	147			0	21								X
221	153			0	21								X
223	156			0	21								X
224	157			0	21								X
225	156			0	21								X
226	160			0	21		COMPOSITE: N	24	>210°	No	7		X
227	159			0	21								X
228	162			0	21								X
229	163			0	21								X
230	164			0	21								X
231	161			0	21								X
323	158			0	21								X
233	152			0	21								X
234	149				21								X
Bldg. 15:													
5 kettles				0	21	-							
1 tank				0		-							
Paint on floor				0	21	0	C	76	>210°	No			X
235				0	21	-							
236				0	21	-							
237				0	21	0	C	27	>210°	No			X
238				0	21	0	N	26	>210°		9		X
239				0	21	0							X

Table 4-1B

FIELD AND LABORATORY DATA SUMMARY

RESIN STORAGE
(Continued)

Tank ID		EPA Data		Field Data					Laboratory Data			Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	LEL[2]	Combus-tibility[3]	Lab[4] ID#	Flash point[5]	E.P. Toxic[6]	pH[6]	Yes[7]	No
--	114			0	21	-							
--	115			0	21	-							
--	6-3			0	21	-							
--	6-5			0	21	-							
--	6-6			0	21	-							
--	205			0	21	0							X
--	206			0	21	0							X
--	6-2			0	21	-							
--	6-4			0	21	27	C	81	106°	No		D001	
--	6-7			0	21	-							
--	6-8			0	21	-							
--	121			0	21	0							X
--	122			0	21	0							X
--	123			0	21	0	N	83		No	6		X
--	124			0	21	3						D001	
198	126			0	21	4						D001	
199	127			0	21	2							X
200	128			0	21	12	C	79	98°	No		D001	
201	129			0	21	0							X
202	130			0	21	0.							X
203	131			0	21	0							X
204	132			0	21	70	VC	80	68°	No		D001	
205	133			0	21	37						D001	
FLOOR - Bldg. 5C				0	21	5	C	78	110°	No			X

Footnotes

1. Lower explosive limit measured as the % LEL in the tank.
2. Lower explosive limit measured as the % LEL at the surface of the residue
3. Combustibility measured qualitatively based on ability of material to burn.
   VC = very combustible, readily burns when exposed to an open flame.
   C = combustible, burns only after residue has been heated.
   N = noncombustable
4. Laboratory identification number assigned to samples collected.
5. Flash point in F°, as determined by procedures outlined in Appendix 5. Analysis performed by James A. Kinsey.
6. Evaluation of Pace Laboratory, Inc. analytical results presented in Appendix 6 in terms of EPA hazardous waste rules.
7. Overall hazard determination and EPA hazard identification number.

FIELD AND LABORATORY DATA SUMMARY

UNDERGROUND TANKS

Tank ID		EPA Data		Field Data					Laboratory Data[5]		Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	Flash point[2]	Combus-tibility[3]	Lab[4] ID#	E.P. Toxic	GC (prin. components)	Yes[6]	No
080	U-12			68	20	66°	VC	32C		(naptha)	D001	
081	U-14			15	20.2	117°	C	37C		(naptha)	D001	
082	U-11	<80°	6	14	20	(Variable) 71° 114° 123°	N	41C		(water)	D001	
083	U-10			100+	18.5	< 62°	VC	49		(MEK)	U159	
084	U-9	<80°	6	100	19.7	< 62°	VC	31		(blend)	D001	
085	U-6			0	21							
086	U-5			0	21	>210°	C	40C		(oil)		X
087	U-4			5	21	142°	C	48C		(naptha)		X
088	U-7	90°	6	30	19.2	>210°	N	36C		(water)	D001	
089	U-13	>220°	6	0	21		N	39	No	(water)		X
290	U-8			0	21		VC	38		(water, zylol)	U239	
291	U-1			0	21	164°	C	35C		(naptha)		X
292	U-2a	<80°	5	30	21	>210°	N	30C		(water)	D001	
293	U-2b	<85°	5	15	21	>210°	N	33C		(water)	D001	
294	U-3			85	20.5	69°	VC	34C		(blend)	D001	
295	--			0	21							
296	--			0	21							
SUMP	Bldg7C			0	21		N	84	No	(water)		X
--	U-18			0	21							
--	U-20			0	21							
--	U-16			0	21							
--	U-15			0	21	–						
--	U-21			0	21							
--	U-22			0	21							
--	U-23			0	21	>210°	C	17	No	--	D001	
241	U-26			0	21							
242	U-27			0	21							
243	U-28			0	21							
244	U-29			0	21							
245	U-30			100°	19.2	<61°	VC	51		(Butyl acetate)	D001	

Table 4-1C

FIELD AND LABORATORY DATA SUMMARY

UNDERGROUND TANKS

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data[5]			Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	Flash point[2]	Combus-tibility[3]	Lab[4] ID#	E.P. Toxic	GC (prin. components)	Yes[6]	No
246	U-31			0	21							
247	U-32			0	21							
248	U-33			0	21							
249	U-34			0	21							
250	U-35			0	21							
251	U-36			32	20.5		C	73		(butanol)	U031	
252	U-37			7	21	134°	C	74		-	D001	
253	U-38			0	21							
254	U-39			0	21							
255	U-40			0	21							
256	U-43			0	21	191°	C	58X		(oil & water)		X
(257)	U-43			0	21	176°	C	55X		(oil & water)		X
258	U-46	>210°	6	0	21	>210°	N	59B		(water)		X
(259)	U-46			0	21	176°				(min. spirit)		X
260	U-49			10	21	122°	C	54B		(min. spirit)	D001	
(261)	U-49											
263	U-52			15	21	108°	C	68B		(min. spirit)	D001	
(262)	U-52											
264	U-55			10	21	112°	C	64B		(min. spirit)	D001	
(265)	U-55											
(267)	U-57			0	20.5							
269	U-56			0	21	>210°	C	62V	No	-		
(268)	U-56											
269	U-54			8	21	121°	C	72B		(min. spirit)	D001	
(270)	U-54											
272	U-53			16	21	104°	C	71B		(min. spirit)	D001	
(271	U-53											
275	U-50			8	20.5	116°	C	67B		(min. spirit)	D001	
(273)	U-50											
276	U-51			18	21	106°	C	70B		(min. spirit)	D001	
(274)	U-51	<80°										
277	U-47			7	20.5	>210°	C	61B		(min. spirit)		X
(280)	U-47											

Table 4-1C

FIELD AND LABORATORY DATA SUMMARY

UNDERGROUND TANKS

(Continued)

Tank ID		EPA Data		Field Data				Laboratory Data[5]			Hazardous	
EPA#	Valspar#	Flash Point	pH	LEL[1]	O_2	Flash point[2]	Combustibility[3]	Lab[4] ID#	E.P. Toxic	GC (prin. components)	Yes[6]	No
279	U-48			20	21	114°	C	538		(min. spirit)	D001	
(278)	U-48											
283	U-44			0	19.4	>210°	C	56V	No			X
(281)	U-44											
284	U-45			0	21							X
(282)	U-45											
288	U-42			100°+	19.8	< 62°	VC	52		(blend)	D001	
(255)	U-42				21	< 63°	VC	57		(blend)	D001	
287	U-41			0	21	185°	C	63X		(oil, water)		X
(286)	U-41					186°	C	60X		(oil, water)		X
--	U-62			0	21							
--	U-63			0	21	186°	C	75				X
--	U-64			0	21							X
Asbestoes				-	-							

Footnotes

1. Lower explosive limit measured as the % LEL in the tank.
2. Flash point in F°, as determined by procedures outlined in Appendix 5. Analysis performed by James A. Kinsey.
3. Combustibility measured qualitatively based on ability of material to burn.
   VC = very combustible, readily burns when exposed to an open flame.
   C = combustible, burns only after residue has been heated.
   N = noncombustible
4. Laboratory identification number assigned to samples collected.
5. Evaluation of Pace Laboratory, Inc. analytical results presented in Appendix 6 in terms of EPA hazardous waste rules.

Table 4-2
PHYSICAL DESCRIPTION SUMMARY

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
7th Floor Bldg. 8		309	--	Used equipment possibly a filter press	--	--
6th Floor Bldg. 12	076	--	350	Portable Vat-MT located below a hole in the roof	0	--
5th Floor Bldg. 12	070	--	500	MT	0	--
	071	--	500	MT	0	--
	(069)	LT3	500	MT	0	--
Bldg. 7	072	--	500	MT Vat 2" rusty water	0	--
	073	--	500	MT Vat (cone bottom)	0	--
	074	--	500	MT Vat	0	--
	075	--	500	MT Portable Vat on scale under pipe 2 gal. leaking pipes	<2	Hazardous
4th Floor Bldg. 12	068	--	800	Caustic 8"x7'x5'	190	Non-hazardous
3rd Floor Bldg. 7	030	27	1600	MT	0	--
	031	26	1600	MT	0	--
	032	25	1600	MT	0	--
	033	24	1600	MT	0	--
	034	23	1600	MT	0	--
	035	22	1600	MT	0	--
	036	21	1600	MT	0	--
	037	20	1600	MT	0	--
	038	19	1600	MT	0	--
	039	18	1600	MT	0	--
	040		1600	MT - solid	0	--
	041	16	1600	8",6'x6' flowable	195	Hazardous liq.
	042	15	1600	1" dry crust soft solid	22	Hazardous solid
	043	14	1600	MT	0	--
	044	13	1600	MT	0	--
	045	12	1600	MT	0	--
	046	11	1600	MT	0	--
	047	10	1600	MT	0	--
	048	9	1600	Cranberry red ½" soft solid	11	Hazardous solid
	049	8	1600	½" soft solid	11	Non-hazardous
	10 gal. can		10	glue pot	10	Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
3rd Floor						
Bldg. 8	050	7	1600	MT		
	051	6	1600	yel		Hazardous liq.
	052	5	1600	red	drained	Hazardous liq.
	053	4	1600	yel		Hazardous liq.
	054	3	1600	green	3 gal total	Hazardous liq.
	055	2	1600	soft solid 2"		Hazardous liq.
	056	1	1600	soft solid 2"		Hazardous liq.
	057	33	1600	MT	0	Hazardous liq.
	058	34	1600	MT	0	--
	059	35	1600	gold	2 gal drained	Hazardous liq.
	060	36	1600	MT	0	--
	061	37	1600	MT	0	--
	062	38	1600	MT	0	--
	063	39	1600	MT	0	--
	064	40	1600	MT	0	--
	065	41	1600	MT	0	--
	066	41	1600	MT	0	--
	067	90	1000	1/3 full of liquid	333	Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
3rd Floor						
Bldg. 12	008	84	3200	MT	0	--
	009	83	3200	MT	0	--
	010	82	3200	MT	0	--
	011	81	3200	MT	0	--
	012	79	1600	MT	0	--
	013	78	1600	clear liquid	420	Non-hazardous
	014	77	1600	MT	0	--
	015	76	1600	MT	0	--
	016	75	1600	MT	0	--
	017	74	1600	MT	0	--
	018	73	1600	MT	0	--
	019	72	1600	MT	0	--
	020	71	1600	MT	0	--
	021	70	1600	MT	0	--
	022	69	1600			
	023	68	1600	MT	0	--
	024	67	1600	MT	0	--
	025	66	1600	MT	0	--
	026	65	1600	MT	0	--
	027	64	1600	MT	0	--
	028	63	1600	MT	0	--
	029	62	1600	MT	0	--
	--	29	1600	MT <1" solid white	0	
	--	"Caustic"	30	Full	30	Non-hazardous
2nd Floor						
Bldg. 10	005	--	3800	MT 1" hard black	0	--
	006	--	3800	MT 2" hard black	0	--
	011	--	800	Clear yellow oil- electrical equip.	400	Non-hazardous
1st floor						
Bldg. 10	001	--	20,000	MT	0	--
	002	--	20,000	.MT	0	--
	003	--	20,000	12" liquid	966	Non-hazardous
	004	--	20,000	24" liquid + solid	1933	Non-hazardous
	--	CT1	1800	4" solid	70	Non-hazardous
	--	CT2	1800	6" liquid	1270	Non-hazardous
	--	CT3	1800	5" liquid	1050	Non-hazardous
	--	--	30	2 MT	0	--
Main Floor						
Bldg. 11	007	--	5000	6"x7'x20' sludge cube - white, saturated solid	500	Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
Basement Bldg. 12	077	--	1200	MT	0	--
	078	--	1200	2' liquid	450	Non-hazardous
	079	--	1200	5" solid	94	Non-hazardous
South Bldg. 6	94	30	2500	MT	0	--
	95	29	2500	MT	0	--
	96	28	2500	MT	0	--
	97	27	2500	MT	0	--
	98	26	2500	2" with 1/4" liquid	50	Non-hazardous
	99	25	2500	MT	0	--
	100	24	2500	½" liquid with skin	11	Non-hazardous
	101	23	2500	3" solid - no liquid	66	Hazardous solid
	102	22	5000	MT	0	--
	103	21	2500	¼" liquid	6	Non-hazardous
	104	20	2500	5" rubbery solid	110	Non-hazardous
	105	19	2500	1/16" liquid	3	Non-hazardous
	106	18	2500	1/8" skin 1/8" liquid resin	6	Non-hazardous
	107	17	5000	½" clear skin	11	Non-hazardous
	108	16	5000	½" skin-dry clear	11	Hazardous solid
	109	15	5000	MT	0	--
	110	14	5000	MT	0	--
	111	13	5000	MT	0	--
	112	54	2500	MT	0	--
	113	53	2500	¼" solid	5	Non-hazardous
	114	52	2500	¼" solid	5	Hazardous solid
	115	51	2500	2" - no liq.	44	Hazardous solid
	116	50	2500	3" rubber - no liquid	66	Hazardous solid
	117	49	2500	3/4" - no liquid	16	Hazardous solid
	118	48	2500	1-1/8" rubber-wet bottom	25	Hazardous liquid
	119	47	2500	MT	0	--
	120	46	2500	MT	0	--
	121	45	2500	1½" rubber solid	33	Hazardous solid

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
South Bldg. 6	122	44	2500	2½" yellow gel liquid below	55	Non-hazardous
	123	43	2500	2" rubber liq with thin skin	44	Hazardous solid
	124	42	2500	2" rubber liq with thin skin	44	Hazardous solid
	125	41	2500	2" rubber	44	Hazardous solid
	126	40	2500	1" rubber	22	Hazardous solid
	127	39	2500	¼" skin - no liquid	5	Hazardous solid
	128	38	2500	2" solid with wet bottom	44	Hazardous liquid
	129	37	2500	2" solid with wet bottom	44	Hazardous liquid
	130	36	1250	MT	0	--
	131	35	1250	2" w/1/8" skin	23	Non-hazardous
	132	34	1250	3" liquid - thin skin	33	Non-hazardous
	133	33	1250	MT	0	--
	134	32	2500	MT	0	--
	135	31	2500	MT	0	--
	160	12	800	MT	0	--
	161	11	800	MT	0	--
	162	10	800	MT	0	--
	163	9	800	MT	0	--
	164	8	800	1" carmel- no skin	7	Non-hazardous
	165	7	800	MT	0	--
	166	6	800	½" honey	4	Non-hazardous
	167	5	800	MT	0	--
	168	4	800	MT	0	--
	169	3	800	1½"	9	Hazardous solid
	170	2	800	2" sol-white but no liq.	14	Hazardous solid
	171	1	800	2" solid - no liquid	14	Hazardous solid
	188	106	2500	2" thin skin liquid	44	Non-hazardous
	189	105	2500	¼" wet bottom, skin	6	Non-hazardous
	190	104	1250	2" w/1/8" skin	23	Non-hazardous
	191	103	1250	MT	0	--
	192	102	1250	MT	0	--
	193	101	1250	MT	0	--
	194	100	2500	3-3/4" liq., ¼" skin	79	Non-hazardous
	195	99	2500	8" liquid, ¼" skin	180	Hazardous liquid
	196	98	2500	1/8" honey, 1/8" skin	5	Non-hazardous
	197	97	2500	¼" honey, ¼" skin	5	Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
North Bldg. 6	136	55	2500	½" brown, brittle	11	Non-hazardous
	137	56	2500	3/4" brown jelly	16	Hazardous solid
	138	--	2500	1" clear skin & white solid	22	Hazardous solid
	139	60	2500	1½" yellow solid & ½" clear liquid	38	Hazardous liquid
	140	61	2500	½" orange skin solid	11	Hazardous solid
	141	62	2500	½" orange skin solid	11	Hazardous solid
	142	63	2500	1½" orange skin jelly, ½" liquid	38	Non-hazardous
	143	64	2500	3" orange skin jelly	66	Hazardous solid
	144	65	2500	½" yellow skin solid	11	Non-hazardous
	145	66	5000	1-½" thick skin jelly	66	Non-hazardous
	146	67	5000	3" skinned solid	132	Hazardous solid
	147	68	5000	2½" thick skin and white jelly	110	Hazardous solid
	148	69	5000	3" red solid	132	Hazardous solid
	149	70	5000	½" hard red skin over rubber	22	Non-hazardous
	150	75	7750	2" yellow solid, ½" skin	158	Hazardous solid
	151	76	7750	2½" solid	175	Hazardous solid
	152	77	8000	2" rubber solid	140	Non-hazardous
	153	78	8000	2" black solid - solv. below	140	Hazardous liquid
	154	79	8000	2½" soft solid - no liquid	175	Hazardous solid
	155	80	8000	3/4" clear rubber solid	53	Hazardous solid
	156	81	4250	1" soft clear rubber	37	Hazardous solid
	157	82	4250	2-3/4" jelly, ½" hard	111	Hazardous solid
	158	83	4250	½" yell. tough & clear	18	Hazardous solid
	159	84	4250	½" clear solid	18	Non-hazardous
	172	88	2500	½" solid resin	11	Hazardous solid
	173	87	2500	¼" hard, clear solid	5	Non-hazardous
	174	86	2500	liquid with thin skin bottom solid brown	11	Non-hazardous
	175	85	2500	½" soft solid	11	Non-hazardous
	176	89	2500	3" honey liquid resin	66	Non-hazardous
	177	90	2500	3" thick skin honey bottom	66	Hazardous liquid
	178	91	2500	12" - 1" top liquid over hard skin	286	Hazardous liquid
	179	92	2500	1" soft skin	22	Non-hazardous
	180	93	2500	3" hard top, liquid bottom	66	Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
North Bldg. 6 (cont.)						
	181	94	2500	4" hard top skin - liquid bottom	88	Non-hazardous
	182	95	2500	4" hard skin, rubber bottom	88	Hazardous solid
	183	96	2500	3" - ½" liquid	66	Non-hazardous
	184	74	1250	1" red solid - no liq.	11	Hazardous solid
	185	73	1250	MT - clean	0	--
	186	72	1250	MT - clean	0	--
	187	71	1250	MT - clean	0	--
Bldg. 6A						
	091	--	350	½ full clear liquid	175	Non-hazardous
	092	--	350	Full clear liquid	350	Non-hazardous
	093	--	150	MT	0	--
Bldg. 7B						
	090	--	800	5" x 7' x 5' caustic sludge	105	Non-hazardous
Bldg. 3						
	206	138		MT	0	--
	207	139		MT	0	--
	208	(140)		MT	0	--
	209	141		MT	0	--
	210	142		MT	0	--
	211	143		MT	0	--
	212	145		MT	0	--
	213	146		MT	0	--
	214	(137)		MT	0	--
	215	(136)		MT	0	--
	216	(135)		½" black liq. - no skin 4' x 7'	2	-- Non-hazardous

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
Bldg. 3-B						
	217	148	20,000	0-4" hard resin, some with clear standing water to bottom of very wet manhole	Total 2,000 gal.	Non-hazardous
	218	151	20,000	"		Non-hazardous
	219	150	20,000	"		Non-hazardous
	220	147	20,000	"		Non-hazardous
	221	154	20,000	"		Non-hazardous
	222	153	20,000	"		Non-hazardous
	223	157	10,000	"		Non-hazardous
	224	156	10,000	"		Non-hazardous
	225	160	8,000	"		Non-hazardous
	226	159	8,000	"		Non-hazardous
	227	162	8,000	"		Non-hazardous
	228	163	8,000	"		Non-hazardous
	229	164	9,000	"		Non-hazardous
	230	161	9,000	"		Non-hazardous
	231	158	10,000	"		Non-hazardous
	232	155	20,000	"		Non-hazardous
	233	152	20,000	"		Non-hazardous
	234	149	20,000	"		Non-hazardous
Bldg. 15						
	Floor	--	--	White paint on floor dark crust	40	Non-hazardous
	5 kettles		--	MT -		--
	1 tank -		--	MT -		--
Bldg. 15-B						
	235	207	4,500	MT	0	--
	236	208	4,500	MT	0	--
	237	209	4,500	5" brown oil	100	Non-hazardous
	238	210	2,100	latex liquid	100	Non-hazardous
	239	211	4,000	latex liquid	150	Non-hazardous
Upper Level Bldg. 5-A						
	--	114	2,500	MT	0	--
	--	115	2,500	MT	0	--
	--	63	100	MT	0	--
	--	65	100	MT	0	--
	--	66	200	MT	0	--

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
Lower Level Bldg. 5-A						
	--	205	1,000	1/4" Yellow oil	1	Non-hazardous
	--	206	1,000	5 gal. Soft solid white top, dark bottom	5	Non-hazardous
	--	62	50	MT	0	--
	--	64	330	2' Brown-black thick oil	150	Hazardous liquid
	--	67	250	MT	0	--
	--	68	250	MT	0	--
Bldg. 5-B						
	--	121	2,250	2" dark & dry	12	Non-hazardous
	--	122	2,250	4" dark & dry	24	Non-hazardous
	--	123	1,250	10" water	35	Non-hazardous
	--	124	500	½" yellow honey	1	Hazardous liquid
Bldg. 5-C						
	198	126	9,250	1-1/8" clear honey 1/8" skin	42	Hazardous liquid
	199	127	9,250	½"yel. gel w/white layer on bottom	20	Non-hazardous
	200	128	9,250	1" carmel + liquid	40	Hazardous liquid
	201	129	9,250	1" skin over ½" clear liquid + wt. skin	40	Non-hazardous
	202	130	9,250	3" thick gel - ½" amber skin	120	Non-hazardous
	203	131	9,250	2" amber gel, ½" skin, ½" wt. base	80	Non-hazardous
	204	132	9,250	2" white gel, 1/8" skin, no liquid	80	Hazardous solid
	205	133	9,250	3/4" white gel - thin skin & brown bottom	30	Hazardous solid
	Floor		--	Soft solid resins and water on top	160	Hazardous solid

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
Bldg. 7-C						
	080	U-12	25,000	17"-2" water on bottom, water in manhole	2,113	Hazardous liquid
	081	U-14	10,200	2"	23	Hazardous liquid
	082	U-11	9,500	15" water in hole	625	Hazardous liquid
	083	U-10	9,500	1" clear liquid	12	Hazardous liquid
	084	U-9	9,500	mostly water 5½"	152	Hazardous liquid
	085	U-6	12,120	MT dry	0	--
	086	U-5	12,120	Clean clear solvent w/rust - 2"	62	Non-hazardous
	087	U-4	8,100	2½"	77	Non-hazardous
	088	U-7	10,200	12.5"	774	Non-hazardous
	089	U-13	10,200	10' 7½" clear liq.	10,200	Non-hazardous
	290	U-8	5,400	2"	28	Hazardous liquid
	291	U-1	7,630	2"	39	Non-hazardous
	292	U-2A	4,050	45"	1,872	Hazardous liquid
	293	U-2B	4,050	33"	1,240	Hazardous liquid
	294	U-3	8,100	6"	208	Hazardous liquid
	295	--	20,000	MT	0	--
	296	--	20,000	MT	0	--
		Sump	--	Water and 2 drums	-	Non-hazardous
Basement Bldg. 11						
	--	U-18	4,000	MT	--	--
	--	U-20	4,000	MT	--	--
	--	U-16	4,000	MT	--	--
	--	U-15	4,000	MT	--	--
	--	U-21	7,000	MT- 1" hard solid	--	--
	--	U-22	3,500	MT- clean	--	--
	--	U-23	3,500	3/4" clear, viscous liq	20	Non-hazardous
Underground Storage Tanks --North						
	241	U-26	8,000	MT	0	--
	242	U-27	8,000	MT	0	--
	243	U-28	8,000	MT	0	--
	244	U-29	8,000	MT	0	--
	245	U-30	8,000	8" liquid	382	Hazardous liquid
	246	U-31	8,000	MT	0	--
	247	U-32	8,000	MT	0	--
	248	U-33	8,000	MT	0	--
	249	U-34	8,000	MT	0	--
	250	U-35	8,000	MT	0	--
	251	U-36	8,000	3½" liquid	109	Hazardous liquid
	252	U-37	8,000	3" liquid	87	Hazardous liquid
	253	U-38	8,000	MT	0	--
	254	U-39	8,000	MT	0	--
	255	U-40	8,000	MT	0	--

Table 4-2
PHYSICAL DESCRIPTION SUMMARY
(Continued)

Location	EPA	Valspar	Capacity (gal.)	Description	Residue Vol. (gal.)	Classification
Underground Storage Tanks --South						
256	(257)	U-43	8,000	4½" - 3½" fuel oil? 1" water	160	Non-hazardous
258	(259)	U-46	8,000	10" - 9" yellow solv. over 1" carmel	686	Non-hazardous
260	(261)	U-49	8,000	1½" clear solvent	30	Hazardous liquid
263	(262)	U-52	8,000	2-3/4" clear solvent w/rust	77	Hazardous liquid
264	(265)	U-55	8,000	6½" clear solvent	445	Hazardous liquid
267		U-57	8,000	trace linseed oil	0	--
269	(268)	U-56	8,000	3½" linseed oil	109	Non-hazardous
289	(270)	U-54	8,000	2½" clear solvent over 1½" rusty water	109	Hazardous liquid
272	(271)	U-53	8,000	2" clear solvent + rust	38	Hazardous liquid
275	(273)	U-50	8,000	2½" - 1" clear solvent over 1" water	67	Hazardous liquid
276	(274)	U-51	8,000	2½" clear solvent	67	Hazardous liquid
277	(280)	U-47	8,000	2-3/4" solvent w/brown paint	77	Non-hazardous
279	(278)	U-48	8,000	2" - 1" clear solvent, 1" rusty water	87	Hazardous liquid
283	(281)	U-44	8,000	4" brown gravy, some liquid	145	Non-hazardous
284	(282)	U-45	8,000	MT	0	--
288	(285)	U-41	8,000	7" - 3" clear solvent 4" water	479	Hazardous liquid
287	(286)	U-41	8,000	2½" fuel oil	67	Non-hazardous
Bldg. 9C						
	--	U-62	25,000	MT	--	--
	--	U-63	25,000	Fuel oil	1,200	Non-hazardous
	--	U-64	10,000	3" fuel oil	200	Non-hazardous

Table 4-3
PRODUCTION AREA SUMMARY

anks						Residue (gallons)							
									Nonhazardous				
						Hazardous			Caustic		Other		
Floor level	# Tanks	# Empty	# Haz.	# Combust.	# Other	Liquid	Solid	Comb.	Sludge	Water	Solids	Water	Oil
7	0	0	0	0	0	--	--	--	--	--	--	--	--
6	1	1	0	0	0	--	--	--	--	--	--	--	--
5	7	6	1	0	0	2	--	--	--	--	--	--	--
4	1	0	0	0	1	--	--	--	190	--	--	--	--
3	62	47	8	2	5	200	22	11	--	60	21	735	--
2	3	2	0	0	1	--	--	--	--	--	--	--	400
1	10	4	0	0	6	--	--	--	70	5,219	500	--	--
B	3	1	0	0	2	--	--	--	94	450	--	--	--
Vats	12	0	0	12	0	--	--	94	--	--	--	--	--
Totals	99	61	9	14	15	202	22	105	354	5,729	521	735	400

	23 tanks	329 gallons	no drums	no pipes
Empty (0.3%)	8 tanks	7 gallons		
To be cleaned	15 tanks	322 gallons		

Table 4-4
RESIN STORAGE AREA SUMMARY

ıks — Residue (gallons)

						Hazardous			Caustic		Nonhazardous Other			
Build.	# Tanks	# Empty	# Haz.	# Combust.	# Other	Liquid	Solid	Comb.	Sludge	Water	Solid	Water	Oil	Skin. Resin
6 South	64	26	6	13	19	381	--	349	--	--	133	--	13	340
6 North	39	3	4	18	14	530	--	1,337	--	--	306	--	66	269
6A	4	1	0	0	3	--	--	--	105	--	--	525	--	--
3	11	10	0	0	1	--	--	--	--	--	--	--	2	--
3B	18	18	0	0	(floor)	--	--	--	--	--	--	2,000	--	--
15	6	6	0	0	(floor)	--	--	--	--	--	40	--	--	--
15B	5	2	0	0	3	--	--	--	--	--	--	250	100	--
5A	11	8	1	0	2	150	--	--	--	--	5	(latex)	1	--
5B	4	0	1	0	3	1	--	--	--	--	36	35	--	--
5C	8	0	2	2	4	82	--	270	--	--	120	--	--	140
tals	170	74	14	33	49	1,144		1,956	105	0	640	2,810	182	749

	47 tanks	3,100 gallons	10 drums	pipes from 14 tanks
Empty (.03%)	5 tanks	52 gallons		-- 1 tank
To be cleaned	42 tanks	3,048 gallons	10 drums	pipes from 13 tanks

Table 4-5
UNDERGROUND TANKS AREA SUMMARY

	Tanks					Residue (gallons)							
									Nonhazardous				
Area	# Tanks	# Empty	# Haz.	# Combust.	# Other	Hazardous Liquid	Solid	Comb.	Caustic Sludge	Water	Other Solids	Water	Oil
Basement	7	6	0	0	1	--	--	--	--	--	--	--	20
Cooper's pit	17	3	10	0	4	7,047	--	--	--	--		10,200	178
North	15	12	3	0	0	578	--	--	--	--	--	--	--
South	17	2	9	0	6	1,399	--	--	--	--	--	686	558
9C	3	1	0	0	2	--	--	--	--	--	--	--	1,400
	(shed)										(asbestos)		
Totals	59	24	22	0	13	9,024						10,886	2,156
To be cleaned			22			9,024	no drums						

ATTACHMENT E

VALSPAR FINAL REPORT (Kinsey Consulting, Inc., 1987)

Kinsey Consulting Inc.
30399 Chardon Lane
Grayslake, Illinois 60030
July 14, 1987

James A. Janssen, P.E., Manager
Immediate Removal Unit
Remedial Project Management Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill road
Springfield, Illinois 62706

Re: 0316005445 -- Cook County
Chicago / Valspar
Superfund / Enforcement
Final Report

Dear Mr. Janssen,

I am writing this letter to document the completion of remedial activities at the above referenced site, in accordance with the work plan approved by the Illinois Environmental Protection Agency (IEPA). The original work plan was proposed in the Phase I Identified Response Action document submitted to the IEPA on October 23, 1985. The work plan was approved with modifications listed in a letter from IEPA dated May 1, 1986 to Mr. Michael J. Quinn, attorney for American National and Trust Company of Chicago (Trust 75860 dated July 6, 1971). As a result of investigations requested in the approval letter, lead dust contamination was identified and the work plan was modified to include the removal of dust from buildings 7,8, and 12. During the conduct of the site clean up, the work plan was modified to include general housekeeping tasks such as the removal of peeling paint from the floors so as to make the property more presentable for sale, and to expand the pipe clean up activities to include all pipes found on the property. Valspar claimed that all pipes were cleared prior to their leaving the site on October 31, 1984. Our investigations found that most pipes were obstructed at their lowest points. They may have been clear in 1984 when Valspar left, but by 1986 when we tested the pipes, residues that had adhered to the inside of the pipes had drained to the low points and obstructed the pipe.

In its final form the work plan included the clean up of the following five areas:

1. Remove dust and peeled paint on floors in buildings 7, 8, and 12.
2. Clean 58 above ground tanks.
3. Clean 23 underground tanks and pressure test to determine if they leak.
4. Clear all production and tank related pipes.
5. Remove unused asbestos insulation in storage shed.

A list of all tanks cleaned is in attachment 1, "Index of Tanks to be Cleaned." A summary of all wastes removed and documentation of their disposition is included in attachment 2, "Waste Volumes and Disposal." A summary of the five clean up tasks that comprised the remedial action is found below.

<u>Lead Contaminated Dust</u>

Floors one through six of buildings 7, 8, and 12 were vacuumed using a 15 gallon Hake Minuteman asbestos vacuum (model no. 80315). Due to ongoing vandalism, new areas containing dust were being exposed as plate steel isleways were removed. To assure complete removal of potentially contaminated dust, we removed all remaining steel sheets and vacuumed the entire surface of the floors. The stair well areas were also vacuumed. Six 55 gallon steel drums of dust were collected. The cleanliness standard was a visual standard. The completion of this task was confirmed by Mitch Levin, the IEPA site manager from the Maywood Regional office.

Above Ground Tanks

Eleven production area tanks, 47 resin storage tanks and the floor of building 5-C were cleaned. Access to each tank was cut using a gas powered circular saw with a steel cutting composite blade. Tanks 177, 178, 195, and G-4 were vented with nitrogen before they were cut to eliminate potentially explosive conditions due to organic vapors. All the other tanks were open to the air and had no organic vapors (LEL < 1 and HNU < 1) until surface skins were disturbed during cleaning. One hundred three 30 gallon plastic drums and nine 55 gallon steel drums of resin and paint residues were removed. The HNU readings inside each of the tanks after cleaning was < 1 ppm. Completion of this task was confirmed by Mitch Levin, the IEPA site manager from the Maywood Regional office.

Underground Tanks

Twenty three underground tanks have been cleaned and pressure tested. This has resulted in 4800 gallons of flammable water waste and sixty one 55 gallon drums of unused solvents. Five of the drums of unused mineral spirits were used to clean up equipment during the project and resulted in two drums of waste solvents that were disposed of. The remaining 56 drums of unused solvents were shipped to Valspar's Kankakee plant for use in the production of paints.

The tanks were pressure tested using nitrogen gas. All twenty three tanks held at a constant pressure for at least four hours. To test the tanks, they were first sealed. The manhole covers were replaced and sealed. The vents, fill pipes, and discharge pipes were disassembled as close to the tank as possible and plugged. Getting a good seal was a problem, because vandals had removed all the valves and in the process loosened connections at nearby elbows. Manhole covers were also very difficult to seal because several were damaged during removal. Tanks 290, 292, and 293 were particularly difficult to seal. The problem with tank 290 was an undetected level indicator line approximately 1/16 inch ID. The tank would not build pressure until the line was plugged. Tanks 292 and 293 turned out to be interconnected and could only be tested as a single unit. The tanks were filled with nitrogen to 5 psi. Within a couple of hours the pressure would drop to between 4.5 psi and 3.5 psi due primarily to changes in gas temperature. The pressure of all of the tanks then held for at least 4 hours. The first four tanks tested were held at constant pressure for three days. Tanks in the cooper's pit area (building 7-C) were held at pressure for 12 to 24 hours. Tanks in the southern tank farm were held at pressure for 4 to 12 hours. No gross leaks were detected. Pressure testing with nitrogen will not detect leaks of less than 0.5 gallons per hour.

An additional observation pertaining to whether or not the underground tanks leak is that there was no floating product in any of the sumps near by the tanks. Building 7C has three sumps and the northern portion of the southern tank farm has one sump.

After the contents of the tanks were removed and the tanks were pressure tested, then the tanks were cleaned. Any remaining liquids were removed with a mop, and the tank was then cleaned with a high pressure hot water detergent rinse. The condensate was then removed with a mop and tested for flash point. If the flash point was less than 140 F, then the process was repeated. Six of the tanks were cleaned a second time, and tank 264 was cleaned a third time.

After cleaning the LEL reading in all tanks was < 1%. The HNU reading in all tanks are in attachment 3. The tanks are open to the atmosphere and will continue to vent. Although some of the tanks still have a measurable HNU response, these levels are less than the TLV's of the organic solvents known to be in the tanks. Therefore, not only are these tanks no longer a potential source of pollution, but the vapors within the tanks no longer pose a potential explosion hazard nor a substantial health hazard.

Pipes

All the pipes on the site were tested by blowing nitrogen through them. All pipes with blockages were cut at their lowest point and drained. A total of five 30 gallon plastic drums of resin and one 55 gallon steel drum of solvent were drained from the pipes. Most of the blockages were in portions of the pipe system that were in tunnels below the first floor. These were low points and may have been clear when Valspar left the site in October 1984. Residues of resin inside the pipes on the upper five stories could have drained to the low points in the tunnels. Almost all of the pipes in the tunnels were blocked and almost all of the pipes above the first floor were clear. The openings of the pipes were tested with an HNU after the pipes were cleared and all readings were less than 5 ppm.

Asbestos

Unused asbestos pipe insulation was stored in their original retail boxes in a shed on the west end of the property between buildings 7 and 8. The boxes were too large to place directly into plastic bags. Even if the bag were large enough, the wetted asbestos would have weighed several hundred pounds and would therefore likely tear the bag. Therefore, the asbestos insulation was wetted using a surfactant solution and repacked into plastic bags, sealed, and double bagged. The bags were loaded into a roll off container and transported to a local landfill for disposal.

The clean up activities specified in the Phase I study as approved by the IEPA have been concluded. These activities have been conducted in accordance with applicable IEPA rules, established health and safety guidelines, and generally accepted engineering practices. If you have any questions please call me at (312) 526-8027 or (312) 295-6020.

Very truly yours,

James A. Kinsey

Attachments
Index of Tanks to be Cleaned
Waste Volumes and Disposal
Underground Tanks After Cleaning

INDEX OF TANKS TO BE CLEANED

Location	EPA	Valspar	Description	Volume	Classification
5th floor Bldg 7	075	vat	on scale under leaking pipes	<2	solid
3rd floor Bldg 7	041	16	8"x6'x6' soft	195	solid D001,D008
	042	15	1" dry crust	22	solid D001,D008
	048	9	1/2" soft red	11	solid D001
Bldg 8	051	6	yellow paint		liquid D001
	052	5	red paint		liquid D001
	053	4	yellow paint		liquid D001
	054	3	green paint		liquid D001
	055	2	soft solid 2"	44	liquid D001
	056	1	soft solid 2"	44	liquid D001
	059	35	gold paint		liquid D001
Bldg 6 South	101	23	3" resin	66	solid
	108	16	1/4" skin-dry clear	11	solid
	114	52	1/4" skin	5	solid
	115	51	2" no liquid	44	solid
	116	50	3" rubber, no liq	66	solid
	117	49	3/4" no liquid	16	solid
	118	48	1-1/8" rubber wet bottom	25	liquid D001
	121	45	1 1/2" rubber	33	solid
	123	43	2" rubber liquid with thin skin	44	solid
	124	42	2" rubber liquid with thin skin	44	solid
	125	41	2" rubber	44	solid
	126	40	1" rubber	22	solid
	127	39	1/4" skin, no liq	5	solid
	128	38	2" solid with wet bottom	44	liquid D001
	129	37	2" solid wiht wet bottom	44	liquid D001
	169	3	1 1/4" resin	9	solid
	170	2	2" solid, white bottom, no liq	14	solid
	171	1	2" solid, no liq	14	solid
	195	99	8" liquid, 1/4" skin	180	liquid D001
Bldg 6 North	137	56	3/4" brown jelly	16	solid
	138	--	1" clear skin with white solid	22	solid

Location	EPA	Valspar	Description	Volume	Classification
	139	60	1 1/2" yellow solid with 1/4" clear liquid	38	liquid D001
	140	61	1/2" orange skin	11	solid
	141	62	1/2" orange skin	11	solid
	143	64	3" orange skin over jelly	66	solid
	146	67	3" skinned solid	132	solid
	147	68	2 1/2" thick skin over jelly	110	solid
	148	69	3" red solid	132	solid
	150	75	2" yellow solid, 1/4" skin	158	solid
	151	76	2 1/2" solid	175	solid
	153	78	2" black solid, solvent under	140	liquid D001
	154	79	2 1/2" soft solid no liquid	175	solid
	155	80	3/4" clear rubber	53	solid
	156	81	1" soft clear rubber	37	solid
	157	82	2 3/4" jelly, 1/4" hard	111	solid
	158	83	1/2" yellow, tough & clear	18	solid
	172	88	1/2" solid resin	11	solid
	177	90	3" thick skin, honey bottom	66	liquid D001
	178	91	12"-1" top liquid over hard skin	286	liquid D001
	182	95	4" hard skin, rubber bottom	88	solid
	184	74	1" red solid	11	solid
Bldg 5A Lower Level	---	64	2' brown-black thick oil	150	liquid D001
Bldg 5B	---	124	1/2" yellow honey	1	liquid D001
Bldg 5C	198	126	1 1/8" clear honey 1/8" skin	42	liquid D001
	200	128	1" carmel over liquid	40	liquid D001
	204	132	2" white gel, 1/8" skin, no liq	80	solid
	205	133	3/4" white gel, thin skin & brown bottom	30	solid
	Floor		0 - 2" soft solid	160	solid

Bldg 7C
Underground Tanks

Bldg 7C
Underground Tanks

Bldg 7C Underground Tanks	080	U-12	17" water layer water in manhole	2,113	liquid D001 (Naphtha)
	081	U-14	2"	23	liquid D001 (Naphtha)
	082	U-11	15" water in manhole (water)	625	liquid D001 (Water)
	083	U-10	1" clear liquid	12	liquid U-159 (MEK)
	084	U-9	5 1/2" mostly water	152	liquid D001 (blend)
	088	U-7	12 1/2" water	774	liquid D001 (water)
	290	U-8	2"	28	liquid U239 (Zylol)
	292	U-2A	45" mostly water	1,872	liquid D001 (water)
	293	U-2B	33"	1,240	liquid D001 (water)
	294	U-3	6"	208	liquid D001 (blend)
North End Tank Farm	245	U-30	8"	382	liquid D001 (Butyl acetate)
	251	U-36	3 1/2"	109	liquid U031 (Butanol)
	252	U-37	3"	87	liquid D001
South End Tank Farm	260	U-49	1 1/2"	30	liquid D001 (Min. sp.)
	263	U-52	2 3/4" clear solvent with rust	77	liquid D001 (Min. sp.)
	264	U-55	6 1/2"	445	liquid D001 (Min. sp.)
	289	U-54	2 1/4" solvent over 1 1/4" water	109	liquid D001 (Min. sp.)
	272	U-53	2"	38	liquid D001 (Min. sp.)
	275	U-50	2 1/2" half water	67	liquid D001 (Min. sp.)
	276	U-51	2 1/4"	67	liquid D001 (Min. sp.)
	277	U-47	2 3/4" brown paint	77	liquid D001 (Min. sp.)
	279	U-48	2" half water	87	liquid D001 (Min. sp.)

288	U-42	7" half water	479	liquid D001 (blend)

Waste Volume and Disposal

Material	Classification	Amount		Manifest	Facility
Flammable water from underground tanks	F003	4800	gal bulk	IL 1620395	EWR Inc
Unused solvents (raw material storage)	N.A.	56	55 gal metal drum	N.A.	Valspar, Kankakee
Non Pumpable Resin					
liquids	D001	49	30 gal plastic	INA 0118174	PCIA
solids	D001	59	30 gal plastic	INA 0118174	PCIA
Pumpable Resin	D001	12	55 gal metal drum	INA 0118175	PCIA
Dust with Lead	D001	6	55 gal metal drum	066009	Marine Shale
Asbestos (non friable)	N.A.	6	boxes	N.A.	local landfill

2200 CHURCHILL ROAD SPRINGFIELD ILLINOIS 62706 (217) 782-6761

EPA Form 8700-22 (3-86)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: ILD081040107
Manifest Document No.: 000001
2. Page 1 of 1

A. Illinois Manifest Document Number: IL 1620395
B. Illinois Generator's ID: 0316005441
C. Illinois Transporter's ID: 0011
D. Transporter's Phone: (815) 634-2211
E. Illinois Transporter's ID
F. Transporter's Phone
G. Illinois Facility's ID: 063020000
H. Facility's Phone: (815) 634-2211

3. Generator's Name and Mailing Address
Valspar Corp.
1330 S. Kilbourne - Chicago, Il. 60623

4. Generator's Phone (312) 762-7000

5. Transporter 1 Company Name: E.W.R., Inc.
6. US EPA ID Number: ILD087157251

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
E.W.R., Inc.
2390 S. Broadway
Coal City, Il. 60416
10. US EPA ID Number: ILD087157251

	HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste Flammable Liquid NOS / Flammable Liquid / UN1993	1	TT	48.00	1	EPA HW Number F003; Authorization No. 0001
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
EWR Stream#14174

K. Handling Codes for Wastes Listed Above in Item #14
1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information
If undeliverable for any reason, return to generator.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: JAMES A KINSEY
Signature: James A. Kinsey
Date: 11/14

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ray Hemmersbach
Signature: [signature]
Date: 11/14

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day

19. Discrepancy Indication Space

0800032

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: R Hanson
Signature: R Hanson
Date: 11/14

ILLINOIS 217-782-3637 — 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS — OUTSIDE ILLINOIS 800/424-8802 or 202/4

DISTRIBUTION: PART-1 GENERATOR PART-2 IEPA PART-3 FACILITY PART-4 TRANSPORTER PART-5 IEPA PART-6 GENERATOR

GENERATOR COPY PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I·L·D·0·8·1·0·4·0·1·0·7 Manifest Document No.: 0·0·0·6·3
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but is required by State law.

3. Generator's Name and Mailing Address
Valspar Paint Company
1330 S. Kilbourne Ave., Chicago, IL
4. Generator's Phone (312) 295-6020

A. State Manifest Document Number: INA 0118174
B. State Generator's ID: 2316000445

RECEIVED

5. Transporter 1 Company Name: Pollution Control Industries of America
6. US EPA ID Number: I N D .0.0.0.6.4.6.9.4.3
C. State Transporter's ID: 2191
D. Transporter's Phone: 219/397-3951

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

ROY F. WESTON, INC.
CHICAGO OFFICE

9. Designated Facility Name and Site Address
Pollution Control Industries of America
4343 Kennedy Ave., East Chicago, Indiana
10. US EPA ID Number: I·N·D·0·0·0·0·6·4·6·9·4·3
G. State Facility's ID: N/A
H. Facility's Phone: 312/597-9500

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste, Hazardous [redacted] solid, N.O.S., Hazardous [redacted] solid, [redacted] NA9189 ORM-E	059	D.M	01770	Gal	F003 [redacted]
b. Waste, Flammable liquid, N.O.S., Flammable liquid UN1993	049	DM	01470	Gal	D001
c.					
d.					

J. Additional Descriptions for Materials Listed Above
11a. ~~Paint~~ [redacted] with F003
11b. Paint and solvent mixture

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Spill/Leak:. Shut off ignition sources; no flares or smoking or flames in hazard area Stop leak without risk. Sm.spills take up with sand or other noncombustible absorbent material. Large spills, dike far ahead of spill. Wash immediately if skin becomes in contact with material

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James A. Kinsey Signature: James A. Kinsey Date: 05 04 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bruce E Johnson Signature: Bruce E Johnson Date: 05 04 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Date Month Day Year

FACILITY

19. Discrepancy Indication Space

0800033

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Rita LaBrams Signature: [illegible] Date: 05 [illegible]

EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

DISTRIBUTION: PAGE 1 (white) TSD MAIL TO GENERATOR
PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE
PAGE 3 (light green) TSD MAIL TO TSD STATE
PAGE 5 (light blue) TSD COPY
PAGE 6 (canary) GENERATOR C
PAGE 7 (white) TRANSPORTER

In case of emergency or spill call the National Response Center at 800/424-8802 or 202/426-2675, Indiana Emergency Response Office 317/633-0144 (night) and the (243-5155 (day)

PCI OF AMERICA

R 10007

Pollution Control Industries of America

4343 Kennedy, East Chicago, IN 46312
(312) 597-9500

DATE: June 1, 1987

EPA ID # IND000646943

Certificate of Materials Recycling

THIS IS TO CERTIFY THAT THE HAZARDOUS WASTE MANIFESTED TO POLLUTION CONTROL INDUSTRIES OF AMERICA ON MANIFEST # INA 0118174 WAS RECYCLED IN ACCORDANCE WITH 40 CFR 266 AS OF 5-15-87.

POLLUTION CONTROL
INDUSTRIES OF AMERICA

GENERATOR Valspar

ADDRESS 100 Corporate North, Suite 101

Bannockburn, IL 60015

BY Kevin Prunsky

TITLE President

SIGNATURE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter) Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I L D 0 8 1 0 4 0 1 0 7
Manifest Document No.: 0 0 0 8 4
2. Page 1 of 1
Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address:
Valspar Paint Company
1330 S. Kilbourne Ave., Chicago, IL

4. Generator's Phone (312) 295-6020

A. State Manifest Document Number: INA 0118175

B. State Generator's ID: 816000445

5. Transporter 1 Company Name: Pollution Control Industries of America
6. US EPA ID Number: I N D 0 0 0 6 4 6 9 4 3

C. State Transporter's ID: 2191
D. Transporter's Phone: 219/397-3951

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address:
Pollution Control Industries of America
4343 Kennedy Ave., East Chicago, Indiana 46312

10. US EPA ID Number: I N D 0 0 0 6 4 6 9 4 3

G. State Facility's ID: n/a
H. Facility's Phone: 312/597-1500

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. ~~Waste, Flammable solid, N.O.S., Flammable solid~~ ~~UN1325~~	0 0 0	D M	20.000	Gal	D001
b. Waste, Flammable liquid, N.O.S., Flammable liquid UN1993	0 1 2	D M	00600	Gal	D001
c.					
d.					

J. Additional Descriptions for Materials Listed Above
11a. Paint sludge
11b. Paint and solvent waste

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
SPILL/LEAK: Shut off ignition sources; no flares or smoking or flames in hazard area. Stop leak without risk. Sm.spills take up with sand or other noncombustible absorbent material. Large spills, dike area ahead of spi[ll]. Wash immediately if skin becomes in contact with MATERIAL.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James A. Kinsey
Signature: James A. Kinsey
Month Day Year: 0 5 1 4 8 7

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Craig Wooton
Signature: Craig Wooton
Month Day Year: 0 5 1 4 8 7

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

800035

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Tito Jaymes
Signature: Tito Jaymes
Month Day Year

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.
State Form 11886

DISTRIBUTION: PAGE 1 (white) TSD MAIL TO GENERATOR; PAGE 2 (goldenrod) GENERATOR MAIL TO GENERATOR STATE; PAGE 3 (light green) TSD MAIL TO TSD STATE; PAGE 5 (light blue) TSD COPY; PAGE 6 (canary) GENERATOR CO[PY]; PAGE 7 (white) TRANSPORTER C[OPY]

In case of a spill call Indiana Office of Environmental Response 317/633-0144 (night) and the ... 317/243-5155 (day)

P C I
OF AMERICA

D 10040

Pollution Control Industries of America

4343 Kennedy, East Chicago, IN 46312
(312) 597-9500

DATE: 7-14-87

EPA ID # IND000646943

Certificate of Destruction

THIS IS TO CERTIFY THAT THE HAZARDOUS WASTE MANIFESTED TO POLLUTION CONTROL INDUSTRIES OF AMERICA ON MANIFEST # INA 0118175 WAS DESTROYED IN ACCORDANCE WITH 40 CFR 264 AS OF 5-6-87.

POLLUTION CONTROL
INDUSTRIES OF AMERICA

GENERATOR Valspar Paint Company

ADDRESS 1330 S. Kilbourne Ave.

Chicago, IL

BY Kevin Prunsky

TITLE President

SIGNATURE

04/17/1987 22:16 CARY FANAFAX UF-403 13126391981 06604547 P.01

DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

RECYCLE / REUSE
MANIFEST № 066009

Form Approved. OMB No. 2050-0039. Expires 9-30

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: I L D 0 8 1 0 4 0 1 0 7 0 0 0 0 3
2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address:
Valspar Paint Co.
1330 S. Kilbourne Ave., Chicago, IL

4. Generator's Phone ( )

A. State Manifest Document Number

B. State Generator's ID: 0316000445

5. Transporter 1 Company Name: [redacted]

6. US EPA ID Number

C. State Transporter's ID: [redacted]

D. Transporter's Phone: 312/597-9500

7. Transporter 2 Company Name: Chicago Industrial Waste Haulers, Inc

8. US EPA ID Number: I L D 9 8 0 7 0 4 9 6 0

E. State Transporter's ID: HU 75 47

F. Transporter's Phone

9. Designated Facility Name and Site Address:
MARINE SHALE PROCESSORS, INC.
HIGHWAY 90 EAST
MORGAN CITY, LOUISIANA 70380

10. US EPA ID Number: L A D 9 8 1 0 5 7 7 0 6

G. State Facility's ID

H. Facility's Phone: (504) 631-3826

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste solid, N.O.S., ORM-E, NA9189	006	DM	00300	Gal	D008 R
b.					R
c.					R
d.					R

J. Additional Descriptions for Materials Listed Above: RECYCLE / REUSE

PCIA, VP-0010

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Some of these materialsz may burn but none of them ignite readily. Contact may cause bur
to skin and eyes. Fire may produce irritating or poisonous gases. Wear protective gear.
Sm.spills: Take up with sand or noncombustible absorbent material.Large spills:dike are

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: James A. Kinsey — Signature: James A. Kinsey — Month Day Year: 10 15 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Craig Weston — Signature: Craig Weston — Month Day Year: 10 15 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Bob Moore — Signature: Bob Moore — Month Day Year: 10 13 87

19. Discrepancy Indication Space

0800037

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Howard Blanchard — Signature: Howard Blanchard — Month Day Year: 10 5 87

Attachment 3

Underground Tanks After Cleaning

Tank #		Used to Contain	% LEL	TLV	HNU ppm
080	U-12	Naphtha	0	100	25
081	U-14	Naphtha	0	100	14
082	U-11	Isopropanol	0	400	15
083	U-10	2-butanone (MEK)	0	200	6
084	U-9	Blend (MEK)	0	200	2
088	U-7	(water)	0	100	<1
290	U-8	Zylene	0	100	15
292	U-2A	(water)	0	100	2
293	U-2B	(water)	0	100	2
294	U-3	Blend (MEK)	0	200	3
245	U-30	Butyl acetate	0	150	<1
251	U-36	Butanol	0	100	<1
252	U-37	Mineral Spirits	0	500	<1
260	U-49	Mineral Spirits	0	500	<1
263	U-52	Mineral Spirits	0	500	<1
264	U-55	Mineral Spirits	0	500	<1
289	U-54	Mineral Spirits	0	500	<1
272	U-53	Mineral Spirits	0	500	<1
275	U-50	Mineral Spirits	0	500	5
276	U-51	Mineral Spirits	0	500	<1
277	U-47	Mineral Spirits	0	500	<1
279	U-48	Mineral Spirits	0	500	<1
288	U-42	Blend (MEK)	0	200	<1

ATTACHMENT F

**SETTLEMENT PROPOSAL PHASE I REPORT:
RESPONSE TO DEFICIENCIES FOR CLOSURE AND SAMPLING PLAN
(IT Corporation, 1990b)**

SETTLEMENT PROPOSAL PHASE I REPORT:
RESPONSE TO DEFICIENCIES
CLOSURE AND SAMPLING PLAN
FOR
1330 KILBOURNE AVENUE
CHICAGO, ILLINOIS 60623

Prepared for:

The Valspar Corporation and Howard Conant

by:

IT Corporation
4190 N. Lexington
St. Paul, MN 55126

October, 1990

PRIVILEGED SETTLEMENT OFFER

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LIST OF FIGURES

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LIST OF ATTACHMENTS (CONT.)

Attachment 9 - Letter to Steve Gobelman from Leo Stern transmitting a letter regarding lead sampling conducted at the site, a proposed work plan for removal of organic contaminants and a safety plan, April 21, 1989

Attachment 10 - Closure Plan for 1330 South Kilbourne Avenue, Chicago, Illinois 60623, May 1990

Attachment 11 - Liquid Chemical Storage Data - Air Pollution Control Survey Circa 1982

Attachment 12 - Formulations Produced in 1983

Attachment 13 - Maps

Map Name	Date	Drawing No.
Sewer Layout	1967	1590
Plot Plan	1971	4381
Tank Layout 15A & 15B Latex Storage	1966	1485
Latex Dept. Bldg #12 3rd thru 5th Floors 2 of 2	1965	1394
Latex Dept. Bldg #12 3rd thru 5th Floors 1 of 2	1965	1394
Tanks U-26 to U-60 and Oil Storage Tanks #147-164	1962	1250
Pipelines for Underground Tanks U-26 to U-60	1962	1251
Certificate of Survey - Parcels 1-4	1971	None

1.0 INTRODUCTION

1.1 SCOPE OF THIS STUDY

On September 7, 1990, representatives of The Valspar Corporation (Valspar) and Howard Conant met with representatives of the Illinois Attorney General's office and the Illinois Environmental Protection Agency. The meeting was to discuss a closure plan submitted in May, 1990 and the purported deficiencies of that plan as expressed in a letter to The Valspar Corporation from Laurence Eastep, dated August 27, 1990.

At this meeting, Valspar's and Howard Conant's representatives agreed to prepare background information necessary for the assessment of the applicability of RCRA to various tanks and appurtenances at the facility. Based on this background, a sampling plan would be prepared to define data gaps. Subsequently, sampling would be conducted and a plan for closure would be submitted. The result of this phased approach is this Phase I report.

This report incorporates via attachments, the prior, extensive sampling, analysis and incremental approvals which have led to the physical status of tanks existing at the site today. The report is organized to respond item by item to specific deficiencies enumerated in the above referenced letter. They are:

1. Description of the Facility (Chapter 2.0)
2. Description of the Waste Management Units (Chapter 3.0)
3. Map of the Facility (Chapter 4.0)
4. Detailed Drawings of the Units (Chapter 5.0)
5. Storage Area Pavement Description (Chapter 6.0)
6. List of Hazardous Wastes (Chapter 7.0)
7. Decontamination of Tanks, Structures, and Soils (Chapter 8.0)
9. Sampling Plan and Analytical Results (Chapter 9.0)
13. Statement of Facility Status After Closure (Chapter 10.0)

The establishment of cleanup levels, description of contaminated soil removal, description of equipment cleaning, the certification statement, post-closure care plan, required signatures and the certification regarding potential releases from solid waste management units will be addressed later, depending on the findings of this analysis and the proposed sampling plan.

1.2 DISCLAIMERS

This Phase I Report constitutes an offer to compromise a disputed claim pursuant to Rule 408 of the Federal Rules of Evidence. Hence, the statements made herein are made in the context of compromise negotiations and shall not be in any way admissible.

1.3 BACKGROUND

Since this facility closed on October 31, 1984, extensive studies, IEPA actions, sampling programs and site cleanups have transpired. In an effort to provide orientation for the present activities, key work products from these former activities have been attached to this report for reference. Key former activities include:

1. Submittal of a Part A Notification. (Appendix 3 of Attachment 2)
2. Submittal of a closure plan for the two operational hazardous waste management units listed in Valspar's original RCRA Part A Notification. (Appendix 3 of Attachment 2)
3. Approval of the closure plan (Referenced in Appendix 3 of Attachment 2)
4. Closure. (Appendix 3 of Attachment 2)
5. Certification of closure. (Appendix 3 of Attachment 2)
6. Receipt of a 4(q) notice requiring response action. (Appendix 1 of Attachment 2)
7. An extensive survey and sampling program responsive to the 4(q) notice, approved by IEPA, and executed on behalf of Valspar. (Attachment 2)
8. Preparation of a Response Action Plan based on the results of sampling. (Chapter 6 of Attachment 2)
9. IEPA approval of that Response Action Plan. (Attachment 3)
10. Execution of the Response Action (emptying and cleaning of tanks and pipelines). (Attachment 4)

11. Documentation of that response. (Attachment 4)

12. Acknowledgement of that response (Attachments 4 and 5)

13. Requests for further study (Attachments 5, 6, 7, 8)

14. Submittal of the requested analysis, a soil work plan and a safety plan (Attachment 9)

15. Preparation of a closure plan designed to document the previous closure of numerous tanks and to investigate and treat in-place constituents that may be found in soils adjacent to underground storage tanks. (Attachment 10)

Throughout this report, relevant historical documents will be referenced so that the reader can correlate the former activities with those proposed.

2.0 DESCRIPTION OF THE FACILITY (ITEM 1)

The Valspar Corporation leased the facility at 1330 Kilbourne Avenue from November 1, 1976, until October 31, 1984. In prior years, the plant had been used for paint manufacturing by Armstrong Paint and Varnish Works, Inc. (Armstrong). A trust of which Howard Conant was a beneficiary acquired the site on July 6, 1971, and donated the site to Goodwill Industries on October 31, 1984. During the years that Valspar leased the buildings, they made latex and solvent-base consumer and industrial coatings, including the manufacture of alkyd resins. Processes included mixing, blending, dispersion, and reactions in polymer processing units. The alkyd resins were manufactured only until 1982 when the resin manufacturing facilities were destroyed in a fire. A typical list of products produced in 1983 is presented in Attachment 12. Over the years of Valspar's operation, chemicals were stored, or product was processed in buildings 1, 2, 3-B, 4, 5-A, 5-B, 5-C, 5-E, 6, 7, 7-C, 8, 10-A, 12, 14, 15-A, 15-B, and underground tank farms. Materials were stored in buildings 10, 11, and 13. In this same general time frame the hazardous wastes transported off-site consisted primarily of F003 and D002 wastes as documented in the Generator Annual Hazardous Waste Reports for 1983 and 1984 (included as Appendix 2 of Attachment 2 to this document). Pumping centers and piping corridors are schematically illustrated in Figure 1 of this report.

Nationally, Valspar manufactures various paints, varnishes and coatings. Its activities are classified under the following four SIC codes:

1. 2851-Latex paint varnish enamel
2. 2699-Industrial and protective coverings
3. 2851-Oil based paints, stain and varnishes
4. 2821-Specialty products, resins and emulsions.

Chapter 4 of Attachment 2 describes the specific operations which occurred on each floor in each building. (Drawing No. 4381 in Attachment 13 of this report illustrates the prior uses of the plant when operated by Armstrong). From November 1, 1976 until 1982, Valspar manufactured resins in polymer reactors located in buildings 4, 4-C, 4-A, 17, 17-A, and 22. Once manufactured, the resins were blended with solvents from the underground tanks. Resins mixed with non-chlorinated solvents were stored in above ground tanks generally located in Building 3, 3-B, 5-A, 5-B, 5-C, 6, 6-A, 15, 15-A, 15-B. Production took place primarily in buildings 7, 8, 10, 11, 12, and 13. Ingredients were pumped to the upper floors of these buildings where they were batched by weight into portable vats. These mixtures were then blended and transported by gravity to lower levels where pigments were added, and the product was canned and stored as inventory prior to shipment to market. Administrative and laboratory activities were also conducted on the site.

In 1982, a fire destroyed the resin production buildings. From 1982-1983, resin and solvent mixes were purchased from vendors and pumped directly to the resin storage tanks where they remained until use. Each resin storage tank was individually valved and piped to the production areas.

By 1984, all use of solvents was terminated. The plant produced only latex paints in its last year of operation.

During early years of operation, metallic pigments were stored in bags or fiber drums in various areas of the production buildings. They were loaded into pigment hoppers on the fourth or fifth floor of buildings 7 and 12. Aluminum and copper pigments were used in paste form. Lead, chromium, cadmium and titanium were used as powders. In 1982, the plant phased out of manufacturing metal based paints.

From time to time, hazardous wastes were generated from the paint manufacturing process. As stated earlier, these wastes were either EP Toxic or spent, non-chlorinated solvents. These wastes were stored at the two hazardous waste storage units identified in the original Part A Notification for the facility (Appendix 3 of Attachment 2). One was a waste storage tank; the other was a waste drum storage area. Hazardous wastes were then manifested off-site for treatment and destruction. When the plant was shut down, a closure plan for the Part A-identified units was submitted to the Illinois EPA (Appendix 3 of Attachment 2). The plan was approved, executed and certified by a registered professional engineer (Appendix 3 of

Attachment 2). Consequently, the regulation of all hazardous waste activities for these two units from the former paint manufacturing activities ceased.

Valspar's and Howard Conant's May, 1990 closure plan addresses the tanks that held ingredients (three underground tank farms, and the resin storage areas) and the tanks that were used for mixing and blending (production areas). As the use of each tank terminated, it was standard practice to drain lines and tanks of their contents, leaving each of the tanks empty. Some non-chlorinated solvents or fuel oil were contained in tanks transferred to Goodwill as part of the assets of the facility. It has recently been alleged that 90 days after Valspar and Howard Conant ceased operations at and ownership of the facilities, ingredient storage and production tanks became regulated hazardous waste tanks by virtue of their contents being abandoned.

After the plant closed, IEPA determined that residual materials in the bottom of the production tanks and the remaining underground tank inventory constituted a potential threat to human health and the environment and issued a 4(q) notice (Appendix 3 of Attachment 2) to mitigate this potential threat. In response to this notice, a "Phase 1 Identified Response Action" report was prepared in 1985. This report (Attachment 2) conducted a comprehensive inventory of tanks and sumps throughout the facility. Upon completion of this inventory a "Site CleanUp Plan" (Chapter 6.0 of Attachment 2) was presented to IEPA, approved with modifications (Attachment 3) and implemented. A letter report detailed the results of the response action (Attachment 4). As a result of those activities each of the tanks identified as containing potentially hazardous material has been emptied and cleaned as described in Attachment 4. These activities were observed and approved by IEPA during implementation (Attachment 4) and acknowledged by letter (Attachment 5). Additionally, as requested by IEPA (Attachments 5, 6, 7 and 8), soil samples were taken in building 7-C (Cooper's Pit Area) (Attachment 9). An in-situ bioremediation plan was proposed to IEPA along with the requested health and safety plan (Attachment 9). IEPA did not respond to this requested work.

3.0 DESCRIPTION OF THE WASTE MANAGEMENT UNITS (ITEM 2)

IT Corporation has compiled available information regarding the former use of various tanks, containers, drums and miscellaneous pots within the Kilbourne Avenue site. Information about each tank is summarized (one tank per page) in Attachment 1. Included in this summary are:

- IEPA No. - The unique tank number assigned by IEPA during the survey conducted in 1985 and documented in Attachment 2.
- Valspar No. - Non-unique tank number used by Armstrong and later by Valspar to identify tanks.
- Tank Type - Above ground Storage (AST), Underground Storage Tank (UST), container or other.
- Building No., Floor Area - Locational descriptions, corresponding to building number on Figure 1.
- Capacity - In gallons, based on a available information.
- Period of Use - Generally unknown.
- Chemical Name - Specific chemical name of contents as estimated from past records. Intended to estimate the material contents believed most likely to be present when the plant closed.
- Purpose - The specific purpose of each tank typically based on records from prior years. It is not necessarily the purpose it was used for at time of closure. Many of the tanks were no longer in use at closure. Some now hold only water.
- 1985 Volume - Quantity, in gallons, estimated during the 1985 survey. Taken from Attachment 2.
- Contents - Description of materials found in bottom of tank during 1985 survey. Taken from Attachment 2.
- Classification - Hazardous, Non-Hazardous based on a sampling data and RCRA exclusions noted in the sections below labeled "Miscellaneous Notes".
- Type Residue - Typically "Liquid" or "Solid" is an interpretation of the "Contents".
- Tank Cleaned - Yes or No. Identifies if the tank was cleaned during the 4(q) response actions. If it was cleaned, the "Present Status" is assumed to be "clean and empty".

- **Samples and Subsequent Values -** Indicate the results of characterization sampling and indicates who conducted the analysis. Taken from Attachment 2.

- **After Cleaning HNu and % LEL -** The response action criteria for cleanup was based on these parameters. HNu values are in parts per million (mg/m^3). The Lower Explosion Limit is in the percent of this minimum explosive mix threshold.

- **Pressure Tested USTs -** Indicates if the UST was pressure tested with Helium as described in Attachment 4.

- **EPA Process Code, EPA Hazardous Waste Number, Estimate of Annual Quantities and Units of Measure -** Provides information requested by IEPA in deficiency number 2. Values are provided for those units which tested as characteristically hazardous and which were not later used for their original purpose or were not solids.

- **Miscellaneous Notes -** Provides for other relevant comments derived from historical information.

- **APC Survey -** Indicates if each tank was (Y) or was not (N) included in the 1983 Air Pollution Control Survey (Attachment 11).

In all, 338 tanks, containers, drums, and miscellaneous pots have been surveyed. Of these, 80 tanks and one container have been identified to merit 4(q) response action. Each has been sampled, washed, and cleaned. (See summary on Page 50 of Attachment 2). Four additional drums were removed and disposed as part of the Response Action.

Table 1 summarizes the applicability of RCRA regulations to the 81 vessels. Of these 80 tanks, 22 of the tanks contained ignitable liquids which were removed, manifested as D001 waste and disposed.

All of the recovered liquid product from 23 underground storage tanks was drummed, shipped to another Valspar plant and used for its intended purpose. These solvents were not "spent material" as defined in 721.101 (c)(1). The material was not discarded or abandoned. It was used for its original purpose at another Valspar plant. It does not meet the definition of solid waste in 721.102. Also, the material is not a hazardous waste by virtue of the exemption provided in 721.102(e)(1) (A),(B), and/or (C) because it was used for its intended use. Nevertheless, in the interest of protecting human health and the environment, Valspar removed the contents and cleaned the tanks as part of the 4(q) response action.

In 1985, thirty-six of the 80 tanks and one container had residual solids which were ignitable using the flash point method. However, this method is designed to be applied only to liquids. It does not apply to solids. These solids do not meet the RCRA ignitable test for solids in 721.121(a)(2). Consequently, they are not RCRA-regulated. However, in the interest of protecting human health and welfare, Valspar removed these contents and disposed of them as D001 wastes.

One container, cleaned during the response action, contained less than one inch of material and is exempt from regulation under RCRA (721.107 (b)(1)(B)). This container was also cleaned and the contents removed. Miscellaneous buckets and four drums were also removed.

In the interest of settlement, the May, 1990 Closure Plan (Attachment 10) took a broader view and addressed the final closure of 42 tanks. These 42 tanks included the liquids removed and used for their intended use. The 42 tanks compare to the 45 tanks identified in Table 1. Three tanks (EPA ID Nos. 88, 292 and 293) were reclassified for this report from "Non-Hazardous" to "liquids shipped and used" due to their low flash points. All are underground tanks whose contents were shipped and used for their intended purpose.

A copy of the original Part A notification which addressed a waste storage tank and drum storage area, is included as Appendix 3 of Attachment 2 to this report. Information regarding each of the 21 remaining units addressed in this closure plan are included in Attachment 1 and summarized in Table 2. This includes the hazardous waste number, the estimated annual quantity of waste, the unit of measure code, and the process codes.

Attachment 11 contains a list of all tanks actively used for storage in 1982, the last year of operation with a tank by tank record of activity. The contents of each tank is also described. IT Corporation has reviewed this list and supplemental information (MSDSs and CAS numbers) provided by Valspar regarding key components of each of these ingredients. The chemical constituents of those key ingredients are included in Table 3.

The potentially RCRA-regulated tanks include only those 21 tanks which contained liquid ignitable residue. These 21 tanks have been identified on the basis of a sampling program and analytical procedures formerly approved by the IEPA (Attachment 3). In the interest of settlement, this closure plan addresses the closure of underground storage tanks which were cleaned as part of the 4(q) response action and additional site soils associated with tankage and piping (See Section 9.0).

The two RCRA-regulated units originally listed on the Part A application for the Kilbourne Avenue site have been certified closed by a registered professional engineer. (See Letter dated March 25, 1985 from Mr. Michael W. Rapps to Mr. Lawrence Eastep contained in Appendix 3 of Attachment 2). IEPA takes no issue with the adequacy or completeness of the closure of these two former units. Consequently they are not addressed in the closure plan presented in May of 1990 (Attachment 10).

Attachment 13 contains drawings provided to Valspar by Goodwill Industries illustrating the layout of various tanks in years past.

4.0 MAP OF THE FACILITY (ITEM 3)

A certified survey, circa 1971 of the parcels 1-4 representing the former Valspar operation at the Kilbourne Avenue site is included in Attachment 13 of this report. Subsequent to this survey, buildings identified as 4-C, 4-A, 17-A, 17, and 4 have burned to the ground and have been removed along with building 22. These buildings had been used until 1982 for resin production. This area is now open and, according to Mr. James Kinsey, the area has been test-pitted by IEPA personnel in former years. Additional reproduction of relevant facility maps as provided by Goodwill are included as Attachment 13 to this report. No other relevant scale drawings are available for the facility.

5.0 DETAILED DRAWINGS OF UNITS (ITEM 4)

Historical records have been searched and the drawings provided by the present owner have been reviewed in an effort to complete the record on this item. The relevant available drawings are presented in Attachment 13. The drawings all predate the Valspar lease period. Therefore, they cannot be expected to represent conditions at the time of Valspar closure.

6.0 STORAGE AREA PAVEMENT DESCRIPTION (ITEM 5)

Tanks to be considered as part of this closure can be grouped into five areas:

1. Production Area Above Ground Storage Tanks
2. Resin Storage Area Above Ground Storage Tanks
3. Cooper's Pit Area Underground Storage Tanks
4. North Tank Farm Underground Storage Tanks
5. South Tank Farm

Production area tanks handled pigments and paint mixtures containing ignitable, non-chlorinated solvents. No evidence of tank ruptures has been found. Occasional, de minimis spills and leaks occurred, but were mopped up as a precaution against fire. Once any residual paint dried, its hazardous characteristic was no longer present. All tanks under consideration were located in floors above grade and release to soils from these tanks is not likely.

The resin storage areas contain solid concrete floors. These are required to support the weight of the tank and its contents. No evidence of tank rupture has been found. Occasionally, spills and line leaks would occur. The resin/non-chlorinated solvent mix would spill to the concrete floor where the solvents would evaporate, thus decharacterizing the ignitable wastes. Entrances and exits for the resin storage buildings were not curbed. Release to the ground would require transport from the area of the leak to the outdoors. For a release to be significant, sufficient quantity would have to exist to allow downward migration of volatile solvents before the solvents can evaporate. No incident of large releases, i.e., tank ruptures, has been identified to date. There is a low to moderate potential for limited release by the doorways of the resin storage buildings.

Underground storage tanks located in and adjacent to building 7-C (Cooper's Pit Area) appear to be contained within a concrete vault. Thick, poured concrete walls are observed surrounding the tank area and all borings that have extended below the invert of the tanks hit concrete.

Similarly, the North Tank Farm is surrounded on all sides by poured concrete walls. The system has a sump to drain the soils around the tanks. It is believed that these tanks are enclosed within a concrete vault.

As described in Attachment 10, the South Tank Farm is bounded on the north by the wall of the North Tank Farm and on the east by the existing Armstrong plant. To the west and south, there does not appear to be any concrete walls. The presence or absence of a concrete base must be established as part of the recommended sampling program to be presented later.

7.0 LIST OF HAZARDOUS WASTE (ITEM 6)

The ingredients known to be used at the plant have been described in Section 3.0 of this report and Table 3 (circa 1982). Although there are not accurate records of the materials in use at the time of shutdown, the plant was only producing latex-based paints which did not utilize any hazardous materials.

As a group, the solvents used are non-chlorinated and considered hazardous because of their ignitability. All material, taken from underground tanks, which might have been a listed waste such as butanol (U031) and MEK (U159) as well as the ignitable solvents (D001 & F003) was shipped to Valspar and used for IT's original intended purpose. When the tanks were emptied, they were immediately cleaned as described in Attachment 4. Consequently, no listed material was abandoned.

Ingredients stored in the resin storage area and the residuals in the production areas were not pure solvents and did not contain more than 10% of the chlorinated F-listed wastes. Therefore, in accordance with the December, 1985 revisions to F001-F006 listings, these materials are not a listed waste. The conclusion is further supported by the preamble to the 1985 revision to RCRA regulations which states "...process waste, where solvents were used as reagents or ingredients in the formulation of commercial chemical products are not covered by the (new) listing (of mixed solvents)." The preamble also says that F003 wastes were listed only for their ignitability. And, "Since the Agency has not evaluated these (F003) solvents for their toxicity, we (USEPA) are not applying the ten percent threshold to ignitable wastes." Finally, the solvents remaining in the tanks at the Kilbourne Avenue Site do not meet the definition of "spent" that would be necessary to apply the listed category of F003.

For these reasons, the closure plan addresses all wastes removed and possibly still present on site as D001-ignitable wastes.

8.0 DECONTAMINATION OF TANKS. STRUCTURE AND SOILS (ITEM 7)

Efforts to decontaminate tanks structures and soils have been previously described in Attachments 2, 4, and 5. Combined, these documents illustrate the formerly approved activities that have been completed at the site. Attachment 10 of the May 1990 Closure Plan, anticipates on-site and in-situ decontamination of soils adjacent to underground storage tanks. With on-site treatment, no off-site transportation or disposal of hazardous waste is anticipated. Consequently, no State of Illinois waste stream permit would be required.

The vast majority of the hazardous constituents which have been transported off-site as part of the response actions are characteristic ignitable wastes. Consequently,the rinse water remains hazardous only until its characteristic hazard is removed. The decontamination of tanks conducted to date is sufficient to conclude that they are closed, no longer representing a potential health or fire hazard, and requiring no further tank maintenance to maintain this chemically safe condition. Therefore, the sampling plan proposed in this document focuses on potential releases to soils.

9.0 SAMPLING AND ANALYSIS PLAN (ITEM 9)

9.1 SAMPLING LOCATIONS AND ANALYTICAL PARAMETERS

Soil sampling will be performed in the soil in the underground storage tank (USTs) vaults in order to determine if releases from spills or tank leaks have occurred. The sampling locations are based on the locations of USTs to be closed. Analytical parameters will be based on materials that were previously located in the tanks. The sampling depths will vary with the location. Samples in the UST vaults will be collected at 18 inches beneath the surface and at either auger refusal (the bottom of the concrete vault) or where liquid is reached in the boring. Based on the size of the USTs, the bottom of the concrete vault is estimated to be 11 or 12 feet below grade. Samples will be collected from:

- Nine locations in Cooper's Pit (Building 7C). See Figure 2.
- Five locations in the north tank farm. See Figure 3.
- Ten locations in the south tank farm. See Figure 4.

One sample will be collected from the off-loading area on the west side of Cooper's Pit to determine if volatile non-chlorinated solvents are present below hardened resin in this area. A soil boring will be collected from 3 feet below a hardened pile of resin. The soil boring sampling procedures are described in Section 9.3 below.

One grab soil sample will be collected from the floor or building 5E where pumping of solvents from Cooper's pit occurred. Soil will be scrapped off of the floor and collected as one sample for analysis.

Duplicate soil samples will be collected at a rate of one duplicate per ten samples collected. The duplicate samples will be collected at the same locations as a regular soil sample. An additional volume of soil will be collected and sent as the duplicate sample. The duplicate sample locations will be determined on the day the samples are collected.

All samples will be analyzed for the Toxic Compound List, volatile organic compounds (VOCs) by U.S. EPA SW-846 Method 8240. This list of organics includes MEK and the other solvents known to be used in the tank areas under investigation.

9.2 SOIL VAPOR SURVEY

A soil vapor survey will be used as a screening tool to locate subsurface areas which may contain volatile organics. A Photoionization Detector (PID) will be used to measure the organic vapors. At locations where a PID reading is substantially higher than background, hand augered boring will be performed and a soil sample will be collected.

The soil vapor survey locations were chosen based on the presence and/or proximity of former pipe racks, pumps, and underground storage tanks. The soil vapor survey will be performed under pipe racks or along the edge of UST vaults and around the footprints of the resin storage buildings in the following areas:

- Between Buildings 7 and 12
- Between Buildings 12 and 13
- Between Buildings 13 and 15
- Between Building 15 and 3
- Outside Buildings 3B and 3F
- Outside Building 6
- Outside Buildings 5E, 5D, 5C, 5B, and 5A
- Outside the North Tank Farm UST vault
- Outside the South Tank Farm UST vault
- Outside Cooper's Pit UST vault

See Figure 1. The survey locations will be based on a 10 feet grid, up to 50 feet wide, depending upon the physical limitations of the area, the width of the pipe racks, and any underground obstructions. A reference point, such as the corner of a building, will be chosen to create the grid. A visual site inspection prior to the soil vapor survey will confirm the survey locations. The soil vapor survey procedures are described in Section 9.4 below.

9.3 SAMPLING PROCEDURES

Samples will be collected with either a hand auger or a power assisted hand auger. Once the desired boring depth is reached, a stainless steel hand auger will be used to obtain the soil sample. A stainless steel trowel will be used to transfer the sample into the appropriate glass sample jars required for the chemical analysis. The remaining sample will be screened with the PID and the reading recorded. After sample collection, the boring hole will be backfilled with the soil that was removed from the hole and the location will be marked with a flag. Samples will not be composited.

To ensure that cross contamination has not occurred, one rinsate blank sample will be collected. The sample will be collected by pouring deionized water over a decontaminated auger and trowel. The water will be collected in sample vials and preserved with HCL. The sample will be held on ice, and handled identically as the soil samples. The rinsate sample will be analyzed for VOCs by the same method as the soil samples.

One trip blank sample will be sent for each day of soil sampling. The trip blank will consist of deionized water in sealed sample jars sent from the laboratory with the sample jars. The trip blank sample will be handled and analyzed identically to soil samples.

The augers and trowels will be properly decontaminated prior to and between use. The decontamination procedures are outlined in Section 9.5 below.

9.4 SOIL VAPOR SURVEY PROCEDURES

At the beginning of each day of field work, the PID will be calibrated with span gas according to manufacturer's instruction. The calibration readings and daily temperature will be recorded. Soil vapor readings will be collected from a depth of approximately 3 feet. To collect the reading, a stainless steel solid probe will be pushed into the ground with a slam bar to create a void space and a stainless steel tube will be lowered into the void space. Soil will be tapped into place around the tube to prevent surface air from entering the space. A PID will be connected to the stainless steel tube with plastic tubing to collect any vapors from soil. The highest reading in the first 30 seconds will be recorded. The tubes will be used once and then decontaminated. The locations will be recorded on a site map along with the depth of the hole, PID reading, time, and location description.

At locations where a PID reading is substantially higher then background, a soil boring will be performed and a soil sample will be collected. The boring will be performed with a hand auger and the soil down to three feet deep will be screened with the PID. The soil with the highest PID reading will be sampled and sent for VOC analysis by the U.S. EPA SW-846 Method 8240.

The soil vapor survey equipment will be decontaminated according to the procedures described below.

9.5 DECONTAMINATION PROCEDURES

All soil sampling equipment - augers, trowels, trays (if used) - will be decontaminated prior to use and between collection of each sample. The equipment will be decontaminated by brushing off gross contamination and washing with hot water and trisodium phosphate (TSP), and rinsing with hot water, methanol, and deionized water. The wash and rinse water will be collected, labeled, and properly disposed. The decontaminated equipment will be kept segregated from the non-decontaminated equipment in aluminum foil.

For Soil Vapor Survey Equipment, the stainless steel tube will be aired out to allow any residual volatiles to clear the tube. After "air out", the tubes will be dry brushed and purged with ambient air prior to being used again. At the end of the day, the tubes will be dried, washed with a clean TSP wash, rinsed with distilled water and allowed to air dry overnight. The plastic tubing will be purged with ambient air and checked with the PID. Any plastic tube that has a PID reading after purging will be discarded. The system will be screened with the PID prior to use to determine if the tools retain and emit any VOCs which may affect subsequent readings.

9.6 DOCUMENTATION AND SHIPMENT

Samples collected will be placed in clean jars, capped, sealed in plastic baggies, and held on ice prior to shipment. The bottles will be labeled and marked in indelible ink with the unique sample number, sampling date and time, project number, and analysis to be performed. Chain-of-Custody and Request-for-Analysis forms will be prepared for each sample and placed into the coolers for shipment to the laboratory. The samples will be packed in coolers with ice and vermiculite or other packing material to maintain a temperature of 4°C. The coolers will be shipped via overnight courier to the ITAS Laboratory in Cincinnati, Ohio or approved equivalent, on the same day the samples were collected.

Chain-of-Custody procedures will be maintained for the samples. Each time custody changes, the new custodian will sign the form and document the data and time. A sample will be considered in custody if it is:

- In one's actual possession,
- In view, after being in physical possession,
- Locked so that no one can tamper with in, after being in physical possession, or
- In a secured area, restricted to authorized personnel.

9.7 QUALITY ASSURANCE/QUALITY CONTROL

At the laboratory, the samples will be received and logged by members of the Field Analytical Services Group. Their work is reviewed by the QC Coordinator and the Laboratory Manager. The duties of the Field Analytical Services Group include:

- Examine all samples and determine if proper temperature was maintained during shipment. If samples were damaged during shipment, the remaining samples will be carefully examined to determine whether they were affected. Any samples affected will be considered damaged. Damaged samples will be noted as so on the Chain-of-Custody form, reported to laboratory management, and removed from the sampling program.
- Verify that holding times were not exceeded.
- Sign and date the Chain-of-Custody and Request-for-Analysis forms and attach the waybill to the Chain-of-Custody.
- Place samples in adequate laboratory storage.

- Enter the following information in the laboratory sample log-in book: project name and number, number and types of samples, project contact, data received in laboratory, analytical groups involved and required testing, person that accepted custody, and storage location.
- Notify Laboratory Managers or Group Leaders of the arrival of the samples.
- Place the completed Chain-of-Custody forms in the project file.

The laboratory will perform non-project-specific matrix spike and matrix spike duplicate samples at a rate of one per twenty samples per day. The matrix spikes will consist of a selected sample, spiked with a specific analyte to determine the effect of the sample matrix on the analytical methodology.

Method blank samples will also be performed in the laboratory as a QC check of its equipment and procedures. The method blank consists of a volume of deionized water carried through the entire analytical procedure. One method blank will be performed for each set. Combined, the matrix spikes, matrix spike duplicates, method blanks, field blanks and field splits will allow for assessment of the accuracy and precision of the analysis.

10.0 STATEMENT OF FACILITY STATUS AFTER CLOSURE (ITEM 13)

This closure plan when complete will constitute final, clean closure with respect to all of the units addressed. Since Valspar and Howard Conant do not control the property, they cannot control the future of the facility. However, each party states that they have no intention to operate the units in any way relating to hazardous waste. This closure plan, when complete, is intended to be the final activity at the site with relation to hazardous waste.

TABLE 1
SUMMARY OF TANKS CLEANED
DURING THE 4(q) RESPONSE ACTION

Liquid, characteristically hazardous contents	22
Liquids shipped to Valspar and used for original purpose. (Exempt under 721.102(e)(A), (B) and/or (C)).	23
Subtotal, All Liquids	**45**
Solids, not ignitable under 721.121(a)(2)	36
TOTAL TANKS	**80**
Container of Solids not ignitable under 721.121(a)(2) and exempt under 721.107(a)(2).	1
TOTAL VESSELS	**81**

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Table 2

Summary of Tanks Possibly Regulated for Closure

1330 Kilbourn Avenue Plant

IEPA NO	VALSPAR NO	BLDG NO	FLOOR	AREA	CAPACITY	UNITS	PURPOSE	1985 VOLUME	CONTENTS (KINSEY)	PRESENT STATUS	EPA PROC.	EPA HAZ WEST	ANNUAL QUANTITY	UNIT
-	6-4	5A	Lower	Resin Storage	330.	Gallons	Resin And Oil	150	2' Brown-black Thick Oil	Cleaned And Empty	S002	D001	0	6
-	124	5B		Resin Storage	500.	Gallons	Resin And Oil	1	1/2" Yellow Honey Color	Cleaned And Empty	S002	D001	0	6
198	126	5C		Resin Storage	9000.	Gallons	Resin And Oil	42	1-1/8" Clear Honey Color, 1/8" Skin	Cleaned And Empty	S002	D001	0	6
200	128	5C		Resin Storage	9250.	Gallons	Resin And Oil	40	1" Carmel Color And Liquid	Cleaned And Empty	S002	D001	0	6
118	048	6	South	Resin Storage	2500.	Gallons	Resin And Oil	25	1-1/8" Rubber - Wet Bottom	Cleaned And Empty	S002	D001	0	6
123	043	6	South	Resin Storage	2500.	Gallons	Resin And Oil	44	2" Rubber Liquid With Thin Skin	Cleaned And Empty	S002	D001	0	6
126	042	6	South	Resin Storage	2500.	Gallons	Resin And Oil	44	2" Rubber Liquid With Thin Skin	Cleaned And Empty	S002	D001	0	6
128	038	6	South	Resin Storage	2500.	Gallons	Resin And Oil	44	2" Solid With Wet Bottom	Cleaned And Empty	S002	D001	0	6
129	037	6	South	Resin Storage	2500.	Gallons	Resin And Oil	44	2" Solid With Wet Bottom	Cleaned And Empty	S002	D001	0	6
139	060	6	North	Resin Storage	2500.	Gallons	Resin And Oil	38	1-1/2" Yellow Solid And 1/4" Clear Liquid	Cleaned And Empty	S002	D001	0	6
153	078	6	North	Resin Storage	8000.	Gallons	Resin And Oil	160	2" Black Solid - Solvent Below	Cleaned And Empty	S002	D001	0	6
177	090	6	North	Resin Storage	2500.	Gallons	Resin And Oil	46	3" Thick Skin Honey Color Bottom	Cleaned And Empty	S002	D001	0	6
178	091	6	North	Resin Storage	2500.	Gallons	Resin And Oil	286	12" - 1" Top Liquid Over Hard Skin	Cleaned And Empty	S002	D001	0	6
195	099	6	South	Resin Storage	2500.	Gallons	Resin And Oil	100	8" Liquid, 1/4" Skin	Cleaned And Empty	S002	D001	0	6
041	016	7	3	Process Area	1600.	Gallons	Mixed Liquid Org	195	8", 6'x 6' Flowable Liquid	Cleaned And Empty	S002	D001	0	6
051	006	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	.50	Yellow - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
052	005	8	3	Process Area	1600,	Gallons	Mix, Thin, Tint	.50	Red - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
053	004	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	.50	Yellow - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
054	003	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	.50	Green - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
055	002	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	.50	2" Soft Solid - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
056	001	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	.50	2" Soft Solid - 3 Gallons Total With 051 Thru 056	Cleaned And Empty	S002	D001	0	6
059	035	8	3	Process Area	1600.	Gallons	Mix, Thin, Tint	2	Gold	Cleaned And Empty	S002	D001	0	6

TABLE 3
SUBSTANCES USED AT KILBOURN AVENUE
IN THE 1980's

SUBSTANCE	COMPOUNDS	%	CAS NO	FLASH PT
Hexylene Glycol	Hexylene Glycol	100	107-41-5	209°F
42m10 Oil mod. Urethane	Ethanol,2-Propoxy- (Ethylene Glycol Mono Propyl Ether)	5%	2807-30-9	105°F
	Distillates (Petroleum), Hydrotreated Light (Mineral Spirits)	45%	64742-47-8	
7F 70 TA100 Chemcoid	Resin Product (No Hazardous Chemicals Present)	......	....	210°F
Acrylic Emulsion	Acrylic Polymer	45-47%	Non Haz.	
	Residual Monomers	Trace	Not Req.	Non-Combustible
	Ammonia	0.2% max	Not Req.	
	Formaldehyde	0.05% max	Not Req.	
	Water	53-55%	Non Haz.	
Acrylic Emulsion	Acrylic Copolymer	49-51%	Not Haz.	
	Individual Residual Monomers	<0.1%	Not Req.	Non-Combustible
	Ammonia	<0.2%	7664-41-7	
	Water	49-51%	7732-18-5	
Vinyl Acrylic Emulsion	Vinyl acetate, butyl acrylate polymer			
	Water	55%	25067-01-0	
	Formaldehyde	45%	7732-18-5	Not Determined (Aqueous System)
	Vinyl Acetate	0.03%	50-00-0	
	Acetaldehyde	0.2%	108-05-4	
	Nonylphenoxyl poly(ethyleneoxy)-ethanol	0.03%	25-07-0	
		Not Req.	9016-45-9	
Recovered Solvent	Mineral Spirits	=85%	....	
	Xylol	=14%	....	....
	Combination of Toluol, VM&P Naphtha & Methyl Ethyl Ketone	=1%		

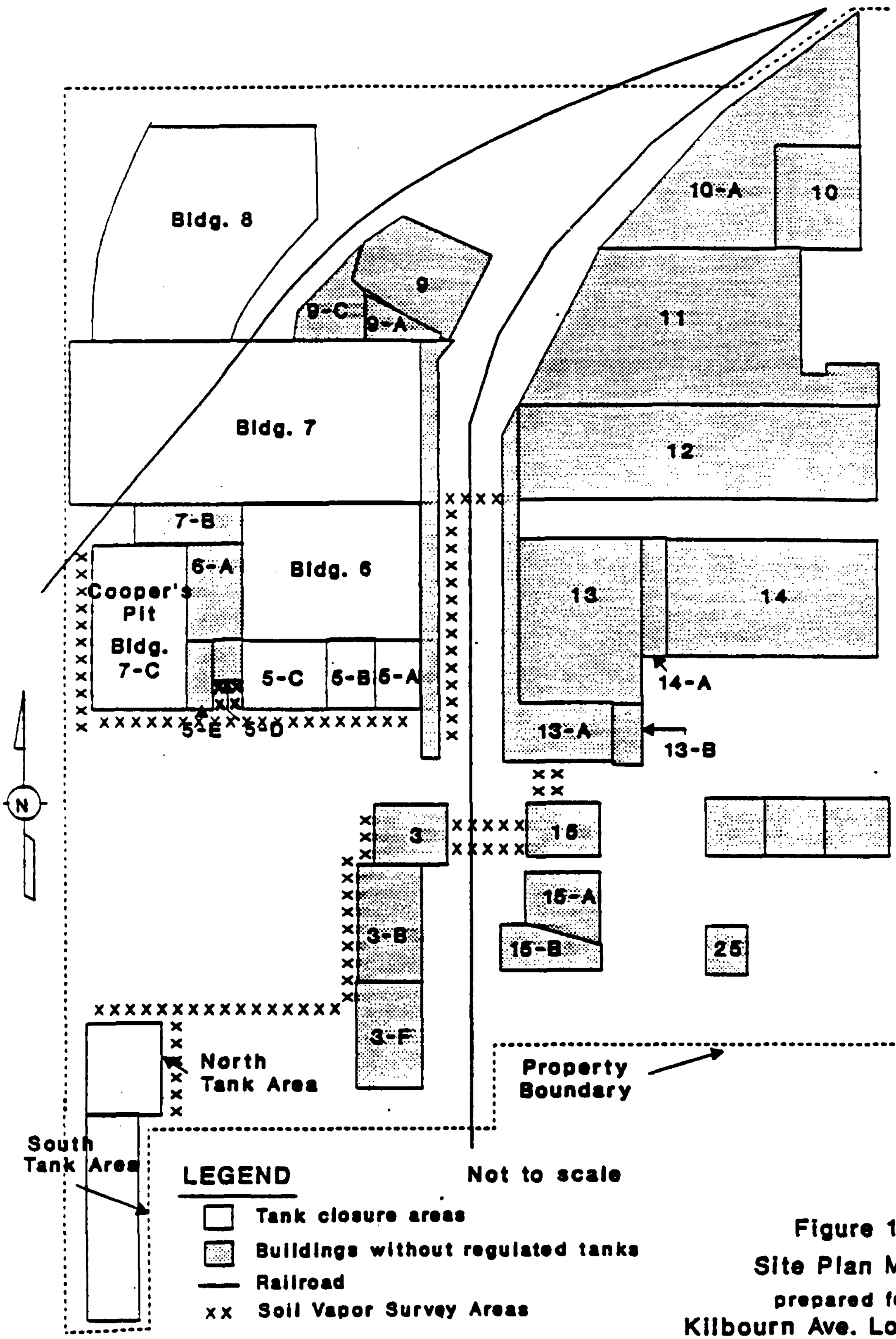
TABLE 3
SUBSTANCES USED AT KILBOURN AVENUE
IN THE 1980's

SUBSTANCE	COMPOUNDS	%	CAS NO	FLASH PT
#140 Aliphatic	Hydrotreated distillate, light DOT shipping name-petroluem naphtha Comparable to stoddard solvent	100%	64742-478	141°F
Mineral Spirits	Hydrotreated distillate, light DOT shipping name-petroleum naphtha Comparable to stoddard solvent	100%	64742-47-8	107°F
VM&P Naphtha	Aliphatic Petroleum Distillates	>95%	64742-89-8	50°F

DRAWING NUMBER 302025-A16

DRAWN BY

APPROVED BY



LEGEND

- Tank closure areas
- Buildings without regulated tanks
- Railroad
- xx Soil Vapor Survey Areas

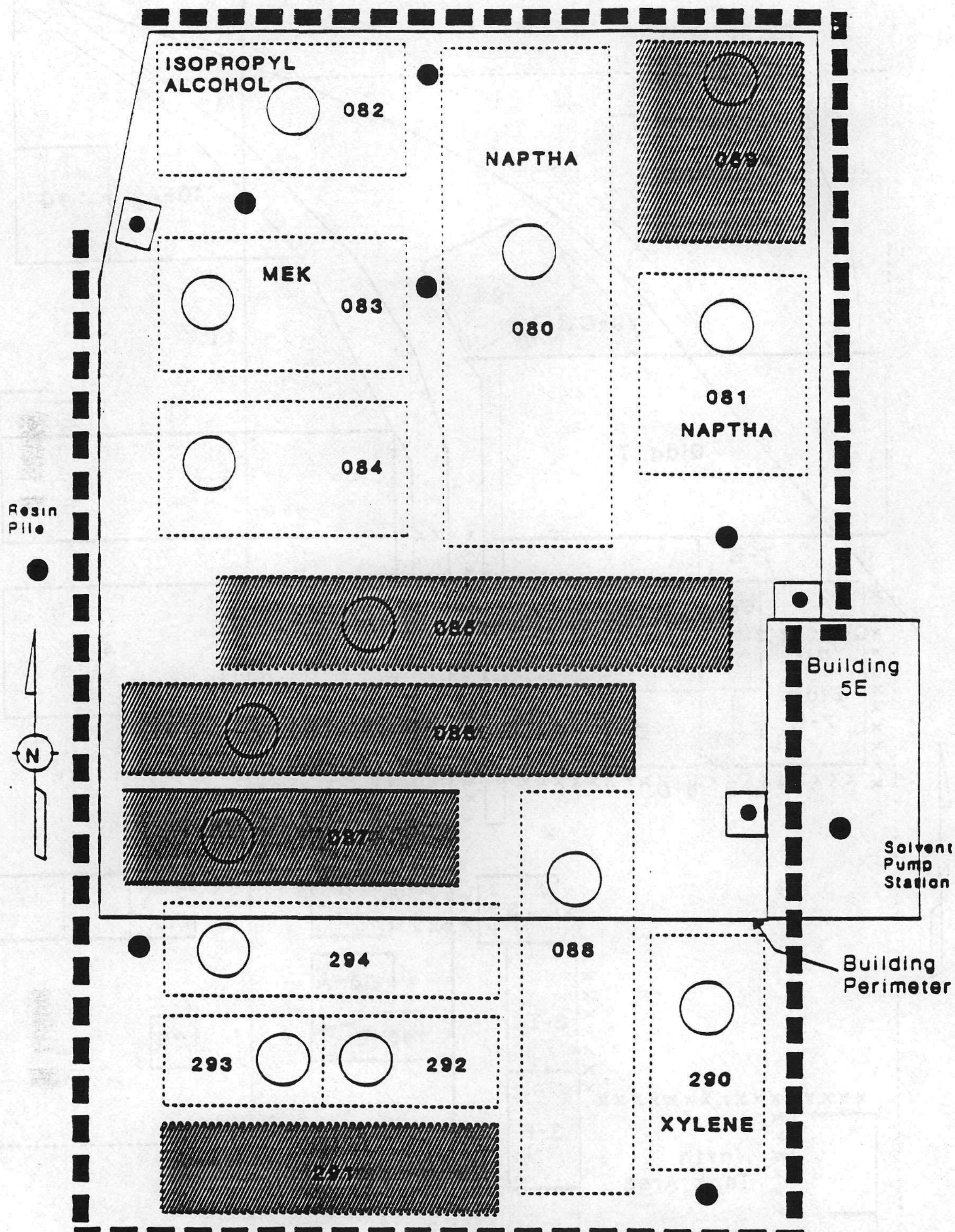
Figure 1
Site Plan Map
prepared for
Kilbourn Ave. Location

Privileged
Settlement Offer

INTERNATIONAL TECHNOLOGY CORPORATION

068359

"Do Not Scale This Drawing"



LEGEND

Tanks to be closed

Unregulated tanks

036 EPA ID #

Sump

Concrete diking

Soil Sampling Locations

Not to scale

Privileged Settlement Offer

Figure 2
Tank Layout
Cooper's Pit Area
prepared for
Kilbourn Ave. Location

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"Do Not Scale This Drawing"

DRAWING NUMBER 302625-A17

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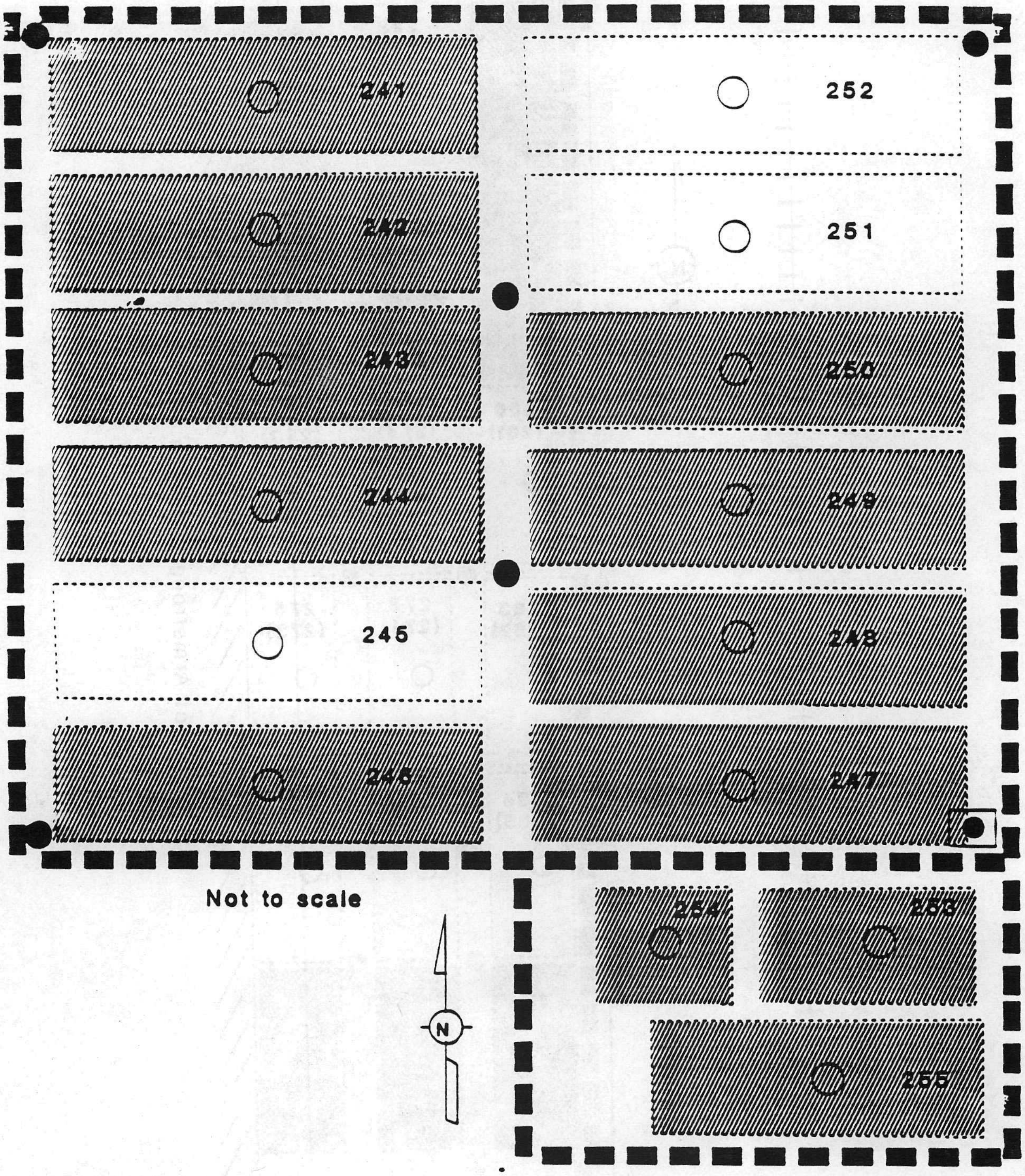
DRAWING NUMBER 302025-A18

CHECKED BY BCS 10/19/90

APPROVED BY

DRAWN BY



LEGEND

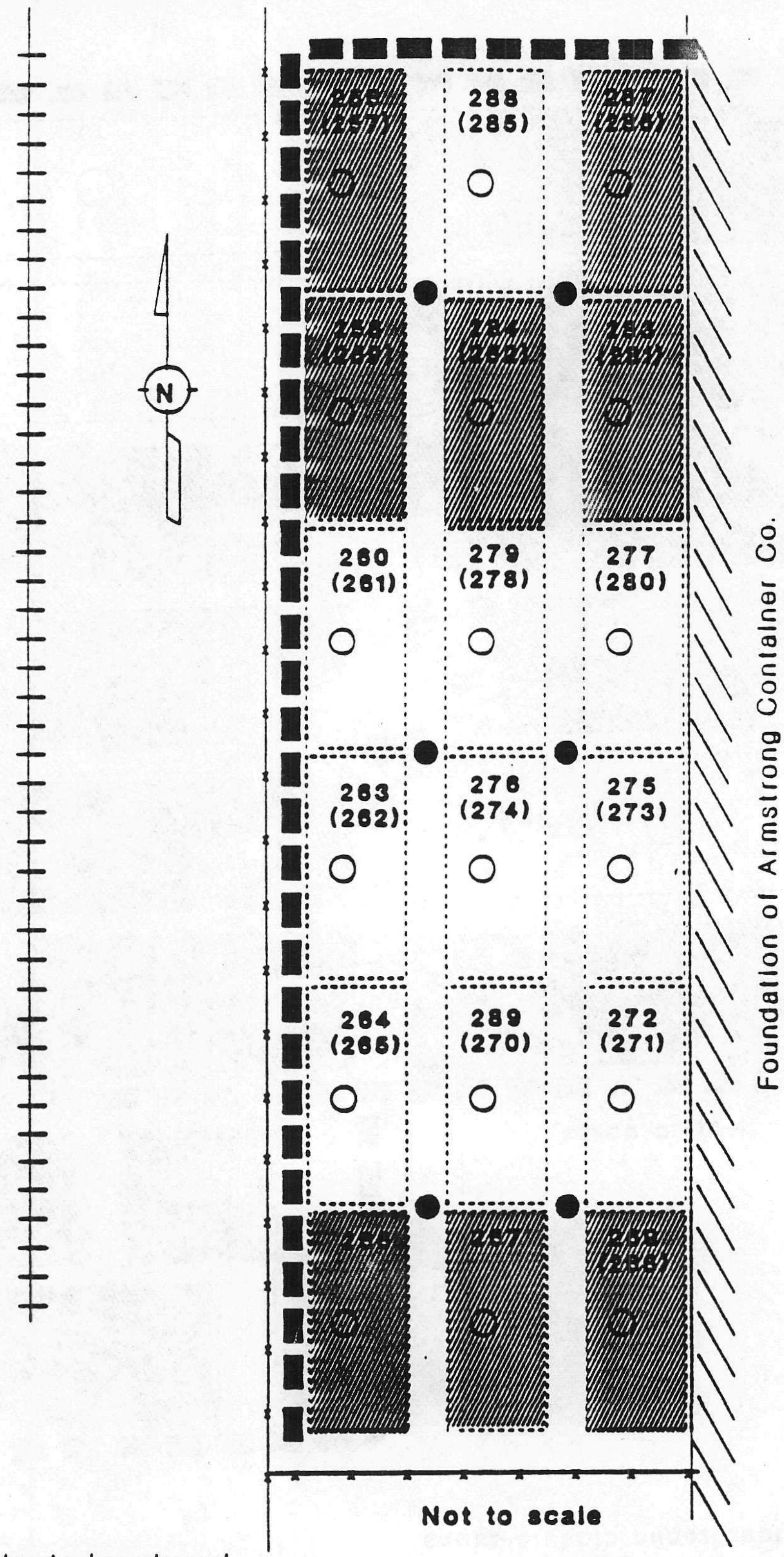
- Underground closure tanks
- Unregulated tanks
- Concrete diking
- Sump
- 246 EPA ID #
- Soil Sampling Locations

Figure 3
Tank Layout
North Tank Area
prepared for
Kilborne Ave. Location

Privileged
Settlement Offer

INTERNATIONAL TECHNOLOGY CORPORATION

068359



LEGEND

Tanks to be closed

Unregulated tanks

276 (274) EPA ID #

Railroad

Fence

Soil Sampling Locations

Figure 4
Tank Layout
South Tank Area
prepared for
Kilbourn Ave. Location

Priveleged
Settlement Offer

INTERNATIONAL TECHNOLOGY CORPORATION

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DRAWING NUMBER

068359

ATTACHMENT G

TANK SUMMARY

ATTACHMENT G
TANK SUMMARY

Because of the large number of tanks at the abandoned paint plant located at 1330 South Kilbourn Street in Chicago, Illinois, PRC Environmental Management, Inc. (PRC), has summarized available information in this attachment to the Preliminary Assessment/Visual Site Inspection (PA/VSI) report. The information in the attached tables was gathered from various sources located during the PA, including IT, 1990b; Kinsey, 1987; and Waste Reduction, 1985 (refer to References in the PA/VSI report). Where possible, PRC attempted to correlate available information with observations made at the site during the VSI.

Because of the sheer number of tanks at the site, the limited guidance available from facility representatives during the VSI, and safety concerns regarding entry into certain areas, some parts of the site were not observed. PRC attempted to gather information regarding the areas and include it with the tables in this attachment.

The tables in this attachment should not be viewed as a complete list of tanks at the facility. Certain tanks included in these tables have been removed from the site. PRC believes that other tanks not yet identified may exist at the site. The various information sources are generally in agreement about the status of various tanks, but this is not always the case. Where conflicting data exist, PRC used its best judgment in presenting the available information.

On the seventh floor of Building 8, past inventories have noted used equipment thought to be a filter press. Past inventories have also noted the presence of five kettles and one tank in Building 15. According to these inventories, the contents of the equipment were nonhazardous (Waste Reduction, 1985). The information available about this equipment was too sketchy to be included in the attached tables.

A list of tables included in this attachment is provided on the following pages.

LIST OF TABLES

LIST OF TABLES (Continued)

TABLE G-1

SUMMARY OF NORTH TANK FARM TANKS

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
241	U-26	8,000	No	No	Unknown[e]	Empty
242	U-27	8,000	No	No	Unknown[e]	Empty
243	U-28	8,000	No	No	Unknown[e]	Empty
244	U-29	8,000	No	No	Unknown[e]	Empty
245	U-30	8,000	Yes	Yes	Butyl Acetate (D001)	Empty
246	U-31	8,000	No	No	Unknown[e]	Empty
247	U-32	8,000	No	No	Unknown[e]	Empty
248	U-33	8,000	No	No	Unknown[e]	Empty
249	U-34	8,000	No	No	Unknown[e]	Empty
250	U-35	8,000	No	No	Unknown[e]	Empty
251	U-36	8,000	Yes	Yes	Butanol (U031)	Empty
252	U-37	8,000	Yes	Yes	Mineral Spirits (D001)	Empty
253	U-38	4,500	No	No	Unknown[e]	Empty
254	U-39	2,500	No	No	Unknown[e]	Empty
255	U-40	6,000	No	No	Unknown[e]	Empty

TABLE G-1 (Continued)

SUMMARY OF NORTH TANK FARM TANKS

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT. 1990b. Kinsey, 1987; Waste Reduction, 1985

TABLE G-2

SUMMARY OF SOUTH TANK FARM TANKS

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
256, 257	U-43	8,000	No	No	Fuel oil[e]	Oil and liquid
258, 259	U-46	8,000	No	No	Mineral spirits[e]	Yellow solvent
260, 261	U-49	8,000	Yes	Yes	Mineral spirits (D001)	Empty
262, 263	U-52	8,000	Yes	Yes	Mineral spirits (D001)	Empty
264, 265	U-55	8,000	Yes	Yes	Mineral spirits (D001)	Empty
266	U-58	10,000	No	No	Fuel oil	Unknown[f]
267	U-57	8,000	No	No	Linseed oil	Linseed oil
268, 269	U-56	8,000	No	No	Varnishes[e]	Linseed oil
270, 289	U-54	8,000	Yes	Yes	Mineral spirits (D001)	Empty
271, 272	U-53	8,000	Yes	Yes	Mineral spirits (D001)	Empty
273, 275	U-50	8,000	Yes	Yes	Mineral spirits (D001)	Empty
274, 276	U-51	8,000	Yes	Yes	Mineral spirits (D001)	Empty
277, 280	U-47	8,000	Yes	Yes	Mineral spirits[e]	Empty
278, 279	U-48	8,000	Yes	Yes	Mineral spirits (D001)	Empty
281, 283	U-44	8,000	No	No	Varnishes[e]	Brown liquid
282, 284	U-45	8,000	No	No	Unknown[g]	Empty
285, 288	U-42	0[h]	Yes	Yes	Solvent blend[i] (D001)	Empty
286, 287	U-41	8,000	No	No	Fuel oil[e]	Fuel oil

TABLE G-2 (Continued)

SUMMARY OF SOUTH TANK FARM TANKS

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] This tank was leased to American Cyanimid and was being used in 1985 according to IT, 1990b.

[g] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[h] The volume of this tank is 8,000 gallons according to Waste Reduction, 1985.

[i] The solvent blend consists of toluene, xylene, 2-butanone, butanol, ethylbenzene, and mineral spirits according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-3

SUMMARY OF THE COOPER'S PIT TANKS

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
080	U-12	25,000	Yes	Yes	VM&P naphtha (D001)	Empty
081	U-14	10,200	Yes	Yes	Naphtha (D001)	Empty
082	U-11	9,500	Yes	Yes	Isopropanol (D001)	Empty
083	U-10	9,500	Yes	Yes	2-Butanone (U159)	Empty
084	U-09	9,500	Yes	Yes	Solvent blend[e] (D001)	Empty
085	U-06	12,183	No	No	Mineral spirits[f]	Empty
086	U-05	12,120	No	No	Oil[g]; texanol[h, i]	Clear liquid
087	U-04	8,100	No	No	#140 Aliphatic naphtha[i]	Naphtha
088	U-07	10,200	Yes	Yes	Water[g]; cellosolve[h] (D001)	Empty
089	U-13	10,200	No	No	Water[g]; toluene[h, i]	Clear liquid
290	U-08	5,400	Yes	Yes	Xylene (U239)	Empty
291	U-01	7,630	No	No	Naphtha[i]	Naphtha
292	U-02A	4,052	Yes	Yes	Water[g]; kerosene[h] (D001)	Empty
293	U-02B	4,050	Yes	Yes	Water[g]; kerosene[h] (D001)	Empty
294	U-03	8,100	Yes	Yes	Solvent blend[e] (D001)	Empty

TABLE G-3 (Continued)

SUMMARY OF THE COOPER'S PIT TANKS

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] The solvent blend probably consists of toluene, xylene, 2-butanone, butanol, ethylbenzene, and mineral spirits (see IEPA No. 285 and 288).

[f] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[g] Material stored in this tank according to Waste Reduction, 1985.

[h] Material stored in this tank according to IT, 1990b.

[i] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-4

SUMMARY OF UNDERGROUND STORAGE TANKS IN BASEMENT OF BUILDING 11

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	U-21	7,000	No	No	Unknown[e]	Hard solid
--	U-22	3,500	No	No	Unknown[f]	Empty
--	U-23	3,500	No	No	Unknown[e]	Clear, viscous liquid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-5

SUMMARY OF UNDERGROUND STORAGE TANKS IN BUILDING 9-C

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
–	U-62	25,000	No	No	Fuel oil[e]	Empty
–	U-63	25,000	No	No	Fuel oil[f]	Fuel oil (1,200 gallons)
–	U-64	10,000	No	No	Fuel oil[f]	Fuel oil (200 gallons)

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-6

SUMMARY OF ABOVEGROUND, OUTDOOR STORAGE TANKS

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
295	–	20,000	No	No	Unknown[e]	Empty
296	–	20,000	No	No	Unknown[e]	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-7

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 3

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
206	138	3,500	No	No	Unknown[e]	Empty
207	139	4,000	No	No	Unknown[e]	Empty
208	140	Unknown[f]	No	No	Unknown[e]	Empty
209	141	2,000	No	No	Unknown[e]	Empty
210	142	2,000	No	No	Unknown[e]	Empty
211	143	4,000	No	No	Unknown[e]	Empty
212	145	2,500	No	No	Unknown[e]	Empty
213	146	2,500	No	No	Unknown[e]	Empty
214	137	3,500	No	No	Unknown[e]	Empty
215	136	Unknown[f]	No	No	Unknown[e]	Empty
216	135	6,000	No	No	Unknown[g]	Black liquid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions inititated by the 4(q) Notice.

[f] Tank volume listed as "Not Available (NA)" in IT, 1990b.

[g] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-8

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 3-B

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
217	148	20,000	No	No	Unknown[e]	Hard resin, clear liquid
218	151	20,000	No	No	Liquid rosin, tall oil (08p50)[e]	Hard resin, clear liquid
219	150	20,000	No	No	Unknown[e]	Hard resin, clear liquid
220	147	20,000	No	No	Raw linseed oil (7p)[e]	Hard resin, clear liquid
221	154	20,000	No	No	Unknown[e]	Hard resin, clear liquid
222	153	20,000	No	No	Liquid rosin, tall oil (08p50)[e]	Hard resin, clear liquid
223	157	10,000	No	No	Unknown[e]	Hard resin, clear liquid
224	156	10,000	No	No	Unknown[e]	Hard resin, clear liquid
225	160	8,000	No	No	Liquid rosin, tall oil (08p50)[e]	Hard resin, clear liquid
226	159	8,000	No	No	Unknown[e]	Hard resin, clear liquid
227	162	8,000	No	No	Unknown[e]	Hard resin, clear liquid
228	163	8,000	No	No	Glycerin[e]	Hard resin, clear liquid
229	164	9,000	No	No	Unknown[e]	Hard resin, clear liquid
230	161	9,000	No	No	Unknown[e]	Hard resin, clear liquid
231	158	10,000	No	No	Liquid rosin, tall oil (08p50)[e]	Hard resin, clear liquid
232	155	20,000	No	No	Unknown[e]	Hard resin, clear liquid
233	152	20,000	No	No	Unknown[e]	Hard resin, clear liquid
234	149	20,000	No	No	Liquid rosin, tall oil (7p2)[e]	Hard resin, clear liquid

TABLE G-8 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 3-B

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-9

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 5-A

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	G-2	50	No	No	Resin and oil[e]	Empty
--	G-3	100	No	No	Resin and oil[e]	Empty
--	G-4	330	Yes	No	Brown-black oil (D001)	Empty
--	G-5	100	No	No	Resin and oil[e]	Empty
--	G-6	200	No	No	Resin and oil[e]	Empty
--	G-7	250	No	No	Resin and oil[e]	Empty
--	G-8	250	No	No	Resin and oil[e]	Empty
--	114	2,500	No	No	Resin and oil[e]	Empty
--	115	2,500	No	No	Resin and oil[e]	Empty
--	205	1,000	No	No	Resin and oil[f]	Yellow oil
--	206	1,000	No	No	Resin and oil[f]	White solid, dark solid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-10

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 5-B

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	121	2,250	No	No	Resin and oil[e]	Dark solid
--	122	2,250	No	No	Resin and oil[e]	Dark solid
--	123	1,250	No	No	Resin and oil[e]	Clear liquid
--	124	500	Yes	No	Resin and oil (D001)	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions initiated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-11

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 5-C

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
198	126	9,000	Yes	No	Alkyd resin, 19m391 (D001)	Empty
199	127	9,000	No	No	Alkyd resin, 19m391[e]	Yellow solid, white solid
200	128	9,250	Yes	No	Resin and oil (D001)	Empty
201	129	9,000	No	No	Alkyd resin, 19m103[e]	Clear liquid, skin
202	130	9,000	No	No	Alkyd resin, 19m397[e]	Gel, ember skin
203	131	9,000	No	No	Alkyd resin, 19m304[e]	Amber gel, skin, liquid
204	132	9,000	Yes	No	Alkyd resin, 19m304 (D001)	Empty
205	133	9,000	Yes	No	Alkyd resin, 19m315 (D001)	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-12

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
094	030	2,500	No	No	Resin and oil[e]	Empty
095	029	2,500	No	No	Resin and oil[e]	Empty
096	028	2,500	No	No	Resin and oil[e]	Empty
097	027	2,500	No	No	Resin and oil[e]	Empty
098	026	2,500	No	No	Resin and oil[f]	Liquid, solid
099	025	2,500	No	No	Resin and oil[e]	Empty
100	024	2,500	No	No	Linseed oil Z2, 7m37[f]	Liquid, skin
101	023	2,500	Yes	No	Linseed oil Z2, 7m37 (D001)	Empty
102	022	5,000	No	No	Resin and oil[e]	Empty
103	021	2,500	No	No	Resin and oil[f]	Liquid
104	020	2,500	No	No	Resin and oil[f]	Rubbery solid
105	019	2,500	No	No	Alkyd resin, 20r48[f]	Liquid
106	018	2,500	No	No	Resin and oil[f]	Liquid, skin
107	017	5,000	No	No	Alkyd resin, 20r48[f]	Skin
108	016	5,000	Yes	No	Alkyd resin, 40r48 (D001)	Empty
109	015	5,000	No	No	Propylene glycol[e]	Empty
110	014	5,000	No	No	Ethylene glycol[e]	Empty
111	013	5,000	No	No	Hexylene glycol[e]	Empty
112	054	2,500	No	No	Resin and oil[e]	Empty
113	053	2,500	No	No	Alkyd resin, 21m327[f]	Solid
114	052	2,500	Yes	No	Resin and oil (D001)	Empty
115	051	2,500	Yes	No	Resin and oil (D001)	Empty

TABLE G-12 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
116	050	2,500	Yes	No	Resin and oil (D001)	Empty
117	049	2,500	Yes	No	Resin and oil (D001)	Empty
118	048	2,500	Yes	No	Resin and oil (D001)	Empty
119	047	2,500	No	No	Resin and oil[e]	Empty
120	046	2,500	No	No	Resin and oil[e]	Empty
121	045	2,500	Yes	No	Resin and oil (D001)	Empty
122	044	2,500	No	No	Alkyd resin, 19m407[f]	Yellow gel, liquid
123	043	2,500	Yes	No	Resin and oil (D001)	Empty
124	042	2,500	Yes	No	Resin and oil (D001)	Empty
125	041	2,500	Yes	No	Resin and oil (D001)	Empty
126	040	2,500	Yes	No	Resin and oil (D001)	Empty
127	039	2,500	Yes	No	Resin and oil (D001)	Empty
128	038	2,500	Yes	No	Resin and oil (D001)	Empty
129	037	2,500	Yes	No	Resin and oil (D001)	Empty
130	036	1,250	No	No	Resin and oil[e]	Empty
131	035	1,250	No	No	Resin and oil[f]	Liquid, skin
132	034	1,250	No	No	Resin and oil[f]	Liquid, skin
133	033	1,250	No	No	Resin and oil[e]	Empty
134	032	2,500	No	No	Resin and oil[e]	Empty
135	031	2,500	No	No	Resin and oil[e]	Empty
136	055	2,500	No	No	Resin and oil[f]	Brittle, brown solid
137	056	2,500	Yes	No	Resin and oil (D001)	Empty

TABLE G-12 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
138	059[g]	2,500	Yes	No	Alkyd resin, 19m39 (D001)	Empty
139	060	2,500	Yes	No	Resin and oil (D001)	Empty
140	061	2,500	Yes	No	Resin and oil (D001)	Empty
141	062	2,500	Yes	No	Resin and oil (D001)	Empty
142	063	2,500	No	No	Alkyd resin, 19m7[f]	Orange jelly, liquid
143	064	2,500	Yes	No	Alkyd resin, 19m7 (D001)	Empty
144	065	2,500	No	No	Alkyd resin, 19m7[f]	Yellow solid skin
145	066	2,500	No	No	Alkyd resin, 19m7[f]	Thick skin jelly
146	067	5,000	Yes	No	Resin and oil (D001)	Empty
147	068	5,000	Yes	No	Resin and oil (D001)	Empty
148	069	5,000	Yes	No	Alkyd resin, 19m20 (D001)	Empty
149	070	5,000	No	No	Resin and oil[f]	Hard skin, rubber
150	075	6,500	Yes	No	Alkyd resin, 19m100 (D001)	Empty
151	076	6,500	Yes	No	Alkyd resin, 19m100 (D001)	Empty
152	077	8,000	No	No	Resin and oil[f]	Rubber solid
153	078	8,000	Yes	No	Resin and oil (D001)	Empty
154	079	8,000	Yes	No	Resin and oil (D001)	Empty
155	080	8,000	Yes	No	Alkyd resin, 21m125 (D001)	Empty
156	081	4,250	Yes	No	Resin and oil (D001)	Empty
157	082	4,250	Yes	No	Resin and oil (D001)	Empty
158	083	4,250	Yes	No	Urethane, 42m10 oil (D001)	Empty
159	084	4,250	No	No	Resin and oil[f]	Clear solid

TABLE G-12 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
160	012	800	No	No	Resin and oil[e]	Empty
161	011	800	No	No	Resin and oil[e]	Empty
162	010	800	No	No	Resin and oil[e]	Empty
163	009	800	No	No	Resin and oil[e]	Empty
164	008	800	No	No	Resin and oil[f]	Carmel-colored liquid
165	007	800	No	No	Resin and oil[e]	Empty
166	006	800	No	No	Resin and oil[f]	Honey-colored liquid
167	005	800	No	No	Resin and oil[e]	Empty
168	004	800	No	No	Resin and oil[e]	Empty
169	003	800	Yes	No	Resin and oil (D001)	Empty
170	002	800	Yes	No	Resin and oil (D001)	Empty
171	001	800	Yes	No	Resin and oil (D001)	Empty
172	085	2,500	Yes	No	Resin and oil (D001)	Empty
173	086	2,500	No	No	Resin and oil[f]	Hard, clear solid
174	087	2,500	No	No	Alkyd resin, 19m258[f]	Liquid, brown solid
175	088	2,500	No	No	Alkyd resin, 19m258[f]	Soft solid
176	089	2,500	No	No	Alkyd resin, 19m258[f]	Honey-colored liquid
177	090	2,500	Yes	No	Resin and oil (D001)	Empty
178	091	2,500	Yes	No	Resin and oil (D001)	Empty
179	092	2,500	No	No	Alkyd resin, 19m39[f]	Soft skin
180	093	2,500	No	No	Resin and oil[f]	Liquid, solid
181	094	2,500	No	No	Resin and oil[f]	Liquid, solid

TABLE G-12 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
182	095	2,500	Yes	No	Resin and oil (D001)[h]	Empty
183	096	2,500	No	No	Ta100 Chemcoid, 7f70[f]	Liquid
184	074	1,250	Yes	No	Resin and oil (D001)	Empty
185	073	1,250	No	No	Resin and oil[e]	Empty
186	072	1,250	No	No	Resin and oil[e]	Empty
187	071	1,250	No	No	Resin and oil[e]	Empty
188	106	2,500	No	No	Resin and oil[f]	Skin, liquid
189	105	2,500	No	No	Resin and oil[f]	Skin, liquid
190	104	1,250	No	No	Resin and oil[f]	Skin, liquid
191	103	1,250	No	No	Resin and oil[e]	Empty
192	102	1,250	No	No	Resin and oil[e]	Empty
193	101	1,250	No	No	Resin and oil[e]	Empty
194	100	2,500	No	No	Resin and oil[f]	Skin, liquid
195	099	2,500	Yes	No	Resin and oil (D001)	Empty
196	098	2,500	No	No	Alkyd resin, 19m390[f]	Honey-colored liquid, skin
197	097	2,500	No	No	Alkyd resin, 19m390[f]	Honey-colored liquid, skin

TABLE G-12 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material is nonhazardous according to IT, 1990b.

[g] There is some uncertainty regarding the correct Valspar identification number for this tank.

[h] Material was shipped as D002 waste according to Waste Reduction, 1985. PRC believes that the material was probably D001 waste.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-13

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 6-A

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
091	--	350	No	No	Unknown[e]	Liquid
092	--	350	No	No	Unknown[e]	Liquid
093	--	150	No	No	Unknown[f]	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-14

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 7

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	Glue Pot	10	No	No	Glue[e]	Glue
030	027	1,000	No	No	Paint mixtures[f]	Empty
031	026	450	No	No	Paint mixtures[f]	Empty
032	025	450	No	No	Paint mixtures[f]	Empty
033	024	450	No	No	Paint mixtures[f]	Empty
034	023	450	No	No	Paint mixtures[f]	Empty
035	022	450	No	No	Paint mixtures[f]	Empty
036	021	900	No	No	Paint mixtures[f]	Empty
037	020	900	No	No	Paint mixtures[f]	Empty
038	019	900	No	No	Paint mixtures[f]	Empty
039	018	900	No	No	Paint mixtures[f]	Empty
040	017	900	No	No	Paint mixtures[g]	Solid
041	016	1,600	Yes	No	Liquid organic waste[h] (D001, D008)	Empty
042	015	1,600	Yes	No	Liquid organic waste[h] (D001, D008)	Empty
043	014	900	No	No	Paint mixtures[f]	Empty
044	013	900	No	No	Paint mixtures[f]	Empty
045	012	900	No	No	Paint mixtures[f]	Empty
046	011	1,000	No	No	Paint mixtures[f]	Empty
047	010	900	No	No	Paint mixtures[f]	Empty
048	009	900	Yes	No	Paint mixtures (D001)	Empty
049	008	900	No	No	Paint mixtures[e]	Solid

TABLE G-14 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 7

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[g] Tank is classified as "Empty - Solid" according to IT, 1990b.

[h] Tank contained "Mixed Liquid Organic Waste For Disposal In Industrial Fabricated Fuel Program" according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-15

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE FIFTH FLOOR OF BUILDING 7

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
072	--	500	No	No	Unknown[e]	Rust colored liquid
073	--	500	No	No	Unknown[f]	Empty
074	--	500	No	No	Unknown[f]	Empty
075[g]	--	500[g]	Yes[h]	No[h]	Unknown[g] (D001)	Empty[h]

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[g] Tank was not identified in IT, 1990b.

[h] PRC assumes that the tank was emptied and cleaned because the material it contained was considered hazardous in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-16

SUMMARY OF ABOVEGROUND STORAGE TANK IN BUILDING 7-B

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
090	--	800	No	No	Unknown[e]	Caustic sludge

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-17

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 8

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
050	007	900	No	No	Paint mixtures[e]	Empty
051	006	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
052	005	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
053	004	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
054	003	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
055	002	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
056	001	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
057	033	800	No	No	Paint mixtures[e]	Empty
058	034	800	No	No	Paint mixtures[e]	Empty
059	035	1,600	Yes	No	Paint mixtures[f] (D001)	Empty
060	036	800	No	No	Paint mixtures[e]	Empty
061	037	800	No	No	Paint mixtures[e]	Empty
062	087	1,300	No	No	Paint mixtures[e]	Empty
063	038	550	No	No	Cleaning solvents[e]	Empty
064	039	550	No	No	Cleaning solvents[e]	Empty
065	040	550	No	No	Cleaning solvents[e]	Empty
066	041	550	No	No	Cleaning solvents[e]	Empty
067	090	1,000	No	No	Unknown[g,h]	Liquid

TABLE G-17 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 8

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material from Tanks 051, 052, 053, 054, 055, 056, and 059 was composited and sampled during the 1985 4(q) response action.

[g] Material is nonhazardous according to IT, 1990b.

[h] Tank was not used by Valspar according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-18

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE FIRST FLOOR OF BUILDING 10

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	--	60	No	No	Acids[e]	Empty
--	CT1	1,200	No	No	Caustic wastewater[f,g]	Solid
--	CT2	1,200	No	No	Caustic wastewater[f,g]	Liquid
--	CT3	1,200	No	No	Caustic wastewater[f,g]	Liquid
001	S-149	8,000	No	No	Unknown[e]	Empty
002	S-150	8,000	No	No	Unknown[e]	Empty
003	S-151	8,000	No	No	Paint mixtures[f,h]	Liquid, solid
004	S-152	8,000	No	No	Paint mixtures[f,h]	Liquid, solid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material is nonhazardous according to IT, 1990b.

[g] This tank was used to neutralize caustic wastewater according to IT, 1990b.

[h] Material from Tanks 003 and 004 was composited and sampled during the 1985 4(q) response action.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-19

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE SECOND FLOOR OF BUILDING 10

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
005	--	3,800	No	No	Unknown[e]	Solid black residue
006	--	3,800	No	No	Unknown[e]	Solid black residue
OIL[f]	--	800[f]	No[f]	No[f]	Clear, yellow oil[f]	Clear, yellow oil

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Tank was not identified in IT, 1990b. Material is nonhazardous according to Waste Reduction, 1985.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-20

SUMMARY OF ABOVEGROUND STORAGE TANKS IN THE BASEMENT OF BUILDING 11

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
–	U-15	4,000	No	No	Unknown[e, f]	Empty
–	U-16	4,000	No	No	Unknown[e, f]	Empty
–	U-18	4,000	No	No	Unknown[e, f]	Empty
–	U-20	4,000	No	No	Unknown[e, f]	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Tank was not used by Valspar according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-21

SUMMARY OF ABOVEGROUND STORAGE TANK ON THE FIRST FLOOR OF BUILDING 11

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
007	--	5,000	No	No	Titanium dioxide slurry[e]	White sludge

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-22

SUMMARY OF ABOVEGROUND STORAGE TANKS IN THE BASEMENT OF BUILDING 12

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
077	--	1,200	No	No	Caustic wastewater[e]	Empty
078	--	1,200	No	No	Caustic wastewater[f,g]	Liquid
079	--	1,200	No	No	Caustic wastewater[f,g]	Solid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material from Tanks 078 and 079 was composited and sampled during the 1985 4(q) response action.

[g] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-23

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 12

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	CAUSTIC	30	No	No	Caustic wastewater[e]	Sludge, clear liquid
--	029	1,600[f]	No	No	Unknown[e,g]	White solid
008	084	1,000	No	No	Paint mixtures[h]	Empty
009	083	1,000	No	No	Paint mixtures[h]	Empty
010	082	1,000	No	No	Paint mixtures[h]	Empty
011	081	1,000	No	No	Paint mixtures[h]	Empty
012	079	900	No	No	Paint mixtures[h]	Empty
013	078	900	No	No	Paint mixtures[e]	Clear liquid
014	077	900	No	No	Paint mixtures[h]	Empty
015	076	900	No	No	Paint mixtures[h]	Empty
016	075	900	No	No	Paint mixtures[h]	Empty
017	074	900	No	No	Paint mixtures[h]	Empty
018	073	900	No	No	Paint mixtures[h]	Empty
019	072	900	No	No	Paint mixtures[h]	Empty
020	071	900	No	No	Paint mixtures[h]	Empty
021	070	900	No	No	Paint mixtures[h]	Empty
022	069	900	No	No	Paint mixtures[h]	Empty
023	068	900	No	No	Paint mixtures[h]	Empty
024	067	900	No	No	Paint mixtures[h]	Empty
025	066	900	No	No	Paint mixtures[h]	Empty
026	065	900	No	No	Paint mixtures[h]	Empty
027	064	900	No	No	Paint mixtures[h]	Empty

TABLE G-23 (Continued)

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE THIRD FLOOR OF BUILDING 12

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
028	063	900	No	No	Paint mixtures[h]	Empty
029	062	900	No	No	Unknown[g,h]	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

[f] Volume reported as 0 gallons in IT, 1990b. Volume reported as 1,600 gallons in Waste Reduction, 1985.

[g] Tank was not used by Valspar according to IT, 1990b.

[h] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

Sources: IT, 1990b Kinsey, 1987; Waste Reduction, 1985

TABLE G-24

SUMMARY OF ABOVEGROUND STORAGE TANK ON THE FOURTH FLOOR OF BUILDING 12

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
068	–	800	No	No	Caustic wastewater[e]	Caustic sludge

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-25

SUMMARY OF ABOVEGROUND STORAGE TANKS ON THE FIFTH FLOOR OF BUILDING 12

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
069	LT3	500	No	No	Unknown[e,f]	Empty
070	--	500	No	No	Unknown[e]	Empty
071	--	500	No	No	Unknown[e,f]	Empty

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions initiated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Tank was not used by Valspar according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-26

SUMMARY OF FORMER ABOVEGROUND STORAGE TANKS IN BUILDING 15-A

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
--	212	12,000	No	No	Vinyl acrylic emulsion	Empty[e]
--	213	12,000	No	No	Acrylic emulsion	Empty[e]
--	215	12,000	No	No	Acrylic emulsion	Empty[e]

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions inititated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was removed before 1985.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985

TABLE G-27

SUMMARY OF ABOVEGROUND STORAGE TANKS IN BUILDING 15-B

IEPA Number	Valspar Number	Volume (gallons)	Tank Cleaned[a]	Tank Pressure-Tested[b]	Past Contents[c]	Current Contents[d]
235	207	4,500	No	No	Acrylic emulsion[e]	Empty
236	208	4,500	No	No	Acrylic emulsion[e]	Empty
237	209	4,500	No	No	Brown oil[f]	Brown oil
238	210	2,100	No	No	Latex[f]	Latex liquid
239	211	4,000	No	No	Acrylic emulsion[f]	Latex liquid

Notes:

[a] Tanks were cleaned in 1985 during response actions initiated by the 4(q) Notice.

[b] Tanks were pressure-tested in 1986 and 1987 by Kinsey.

[c] Tank contents were estimated in 1985 during response actions initiated by the 4(q) Notice.

[d] Current tank contents were inventoried by Valspar in the October 1990 Settlement Proposal.

[e] Tank was empty in 1985 during response actions initiated by the 4(q) Notice.

[f] Material is nonhazardous according to IT, 1990b.

Sources: IT, 1990b; Kinsey, 1987; Waste Reduction, 1985